



GETTING 2 ZERO SUBMISSION

Proposed Amendments to the Domestic Animals Regulations 2025 to Support the Authorised Pet Rehoming Organisation Scheme

Getting to Zero (G2Z) is a national program providing free, remote, and onsite, consulting and support services for local government, not-for-profit organisations, and community groups to improve outcomes for lost/stray and homeless animals, and their caretakers, in every community in Australia.

G2Z works closely with governments, animal welfare organisations and researchers and has specific and practical knowledge on companion animal management and welfare. We welcome the opportunity to engage at any level on this topic.

G2Z welcomes the opportunity to provide feedback on the proposed regulations for the Authorised Pet Rehoming Organisation (APRO) scheme. Our submission draws on direct sector experience and a systemic understanding of how the Victorian companion animal management system functions in practice.

G2Z understands **WHAT** the proposed amendments set out to achieve.

G2Z **DISAGREES** with **HOW** the amendments are proposed to be achieved.

SUMMARY of RECOMMENDATIONS

Our detailed recommendations are set out in each section below. The following is a summary of the key positions in this submission.

Section	Key Position
1. Application & Renewal	Support in principle. Expand ABN compliance to include sole traders with a linked registered business name. Do not require ACNC registration if 84Y agreement access is restricted to APROs.
2. Council Notifications	Support the intent. Oppose the 7-day notification period and requirement to provide individual foster carer addresses. Recommend aggregated monthly reporting instead.
3. Adoption Event Locations	Support mobile adoption events at any public location (not just DABs) for single-day events. Remove the animal sale permit fee for APROs at all locations.
4. Notice of Adoption Events	Support 7 days' notice. Recommend reporting maximum numbers of animals rather than exact numbers. Clarify the role of Animal Management Officers.
5. Care at Adoption Events	Support minimum care standards. Recommend objective, measurable wording. Add provisions for animals exhibiting stress and for socially housed animals.
6. Animal Fate Data Reporting	Support transparent reporting but oppose inequitable burden. Align all sector reporting to an existing recognised model such as Shelter Animals Count. Provide software support.
7. Record Keeping	Support intent. Align individual record requirements to the Code of Practice. AWV to provide software access and training for smaller organisations.
8. Vet Treatments Before Rehoming	Support the requirements. Add medical exemption clauses and clarify what 'up to date' vaccination means. Fund council vet work or reimburse APROs.
9. Restrictions on Rehoming	Oppose blanket prohibition on 'known aggression'. Replace with a prohibition on animals that have caused serious injury assessed against a recognised risk tool. Require full written disclosure and allow an APRO to decide about adoptability based on their capacity.
10. Information to New Owners	Support. Add a mandatory adoption contract and companion animal care standards literature. Specify that change of ownership form must be from the relevant microchip database.
11. 84Y Agreements	Oppose restricting 84Y agreements to APROs only. Allow non-APRO organisations with council-funded vet work. Allow transfer of non-vet



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	worked animals to APRO's. Provide guidance on selecting reputable non-APRO groups.
12. Microchips	Strongly support for APRO's not foster carers. Recommend extending to all PROs, not just APROs. Do not require a signed change of ownership form; accept online transfer portals as sufficient.
13. Cost Recovery Fees	Oppose any fee for APRO registration. Conduct a full Regulatory Impact Statement. Consider recovering costs from councils rather than volunteer organisations.

Introduction

G2Z acknowledges the intent of the APRO framework to improve oversight and accountability in Victoria's pet rehoming sector. We support baseline regulation that ensures animal welfare standards, financial accountability and data transparency across all organisations operating in this space.

However, the proposed regulations in their current form contain several provisions that will place disproportionate administrative and financial burden on volunteer-run rescue organisations, with limited practical benefit. The sector context is critical here: rescue groups and CFCNs exist primarily because the formal animal management system — councils, pounds and contracted providers — has not kept pace with community expectations for live outcomes. These organisations are absorbing substantial public responsibility at no cost to state or local government.

Several specific concerns are raised throughout this submission:

- The proposed compliance burden on APROs is materially higher than what is required of pounds, shelters and council providers under the Code of Practice for the Management of Dogs and Cats in Shelters and Pounds (the Code). This is inequitable and is not justified by any evidence presented in the Consultation Paper.
- Providing individual foster carer addresses to councils will create real barriers to foster participation, reducing the capacity of the sector at a time when demand from council facilities is increasing.
- Restricting 84Y agreements to APRO-registered organisations will reduce pathways to live outcomes for animals in council care and increase humane killing rates.



- No regulatory impact assessment has been conducted that adequately accounts for the cost of compliance to state or local government or volunteer-run organisations, including lost volunteer hours and indirect operational costs.

G2Z's detailed feedback on each section follows.

1. Application and Renewal Requirements for the APRO Scheme

G2Z supports in principle the requirement for APROs to have an ABN and to demonstrate organisational structure and accountability. The proposed information requirements are reasonable and broadly align with what is already captured in the Pet Exchange Register (PER) and on the ACNC register, subsequently creating some duplication.

The requirement to be ACNC registered as a charity will exclude some small but effective volunteer groups, including CFCNs that operate under a sole trader ABN with a registered business name. The cost and complexity of establishing a separate legal entity and maintaining charity registration is prohibitive for many of these groups. Requiring ACNC registration as a prerequisite for APRO membership, while also proposing to restrict 84Y agreement access to APROs only, would exclude legitimate, reputable organisations from council partnership entirely.

G2Z recommends that eligibility requirements for directors of APROs be made explicit and consistent with those applied to other organisations undertaking animal management activities. Directors should be required to confirm they have not been subject to animal cruelty actions, and that the organisation has access to sufficient qualified veterinary support for the care and humane euthanasia of animals in care. Ensuring that Directors are appropriately trained and experienced to properly manage the type of animal/s they are rescuing and to provide training to the carers that they engage is also important.

Recommendations

- Expand ABN compliance options to allow organisations registered as a business name linked to the ABN of the responsible individual (sole trader model), not only separately incorporated entities.



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- Do not require ACNC charity registration if the proposal to restrict 84Y agreements to APROs only is retained. The combined effect of these two requirements would exclude a significant portion of the sector.
- Require directors of APROs to confirm they are not subject to current animal cruelty findings, that the organisation has documented access to veterinary support and that they are suitably trained and experienced.
- Rather than creating a new database, consider expanding the requirements of the PER to capture relevant APRO information and make limited public-facing fields visible.

2. Notifications to Local Councils

G2Z supports the intent of the notification requirements: ensuring councils have the information they need to return lost foster animals quickly and to maintain visibility of animals in their municipality. However, the specific requirements as proposed are not workable for most volunteer-run CFCNs and will generate a compliance burden that is not proportionate to the goal.

The 7-day notification period is significantly more onerous than what is required of pounds and shelters under the Code. Requiring volunteer organisations to notify councils more frequently than paid, staffed organisations is not justified and sets an inequitable standard.

The proposal to provide individual foster carer names and street addresses, and notification of any move within the municipality, to councils, are the most significant concern in this section. The stated purpose is to enable councils to return lost foster animals promptly. However, in practice, most foster carers consulted by G2Z have indicated they would cease fostering if their details were shared with council, due to concerns about enforcement of pet number limits, privacy and regulatory exposure. A reduction in foster capacity will directly increase pressure on council facilities and increase humane killing rates.

The goal of prompt return of lost animals can be achieved through less intrusive means.

Recommendations

- Replace the 7-day notification requirement with a 14 to 30-day aggregated notification cycle, consistent with the practical requirements of volunteer-run organisations.



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- Remove the requirement to provide individual foster carer addresses. Replace with the total number of animals by species currently in the municipality.
- Require APROs to notify councils of adopted animals' new owner details as per the requirements for Domestic Animal Businesses under Section 13 of the Domestic Animals Act.
- Animal Welfare Victoria could consider providing reusable visual ID tags to APROs for use on foster animals, linked to the APRO's digital profile, to assist councils in returning straying foster animals without requiring individual carer address disclosure.
- Support a permanent exemption from council registration for all animals in foster care, not only for the first 12 months. Registration should be required of the new owner at the point of adoption.

3. Adoption Event Locations

G2Z supports the increased use of mobile and pop-up adoption events as a strategy to increase visibility and accessibility for potential adopters who would not typically visit a shelter, pound or pet shop. Evidence from Australian, US and UK programs¹ shows that adoption events at accessible community locations improve adoption rates when appropriate care standards are observed.

Limiting adoption event locations to domestic animal businesses (DABs) does not achieve a meaningful animal welfare benefit for single-day events where animals arrive and leave with their foster carer. The restriction is unnecessarily limiting. Furthermore, holding adoption events at pounds or shelters with active intake populations creates a real risk of disease re-exposure for foster animals of known health status, even with appropriate biosecurity in place.

For multi-day events where animals will be housed on site overnight, location restrictions to appropriate DABs are reasonable.

¹ <https://journal.iaabcfoundation.org/adoption-events/>

<https://www.aspc.org/animal-placement/adoption-center/mobile-adoption-events>



Recommendations

- Permit single-day adoption events at any privately or Council-owned location accessible to the public with pets, provided basic necessities are present: clean running water, shelter from weather and adequate waste disposal.
- Retain the location restriction to DABs for multi-day adoption events where animals will be kept on site overnight.
- Remove the animal sale permit fee for APROs regardless of where the adoption event is held.
- Focus compliance effort on animal care standards during events rather than prescribing eligible locations.

4. Notice of an Adoption Day Event

G2Z supports the requirement for seven business days' notice of a planned adoption event to the relevant local council. This is a reasonable lead time for councils to note the event and attend if needed.

The requirement to provide an exact number of animals is not workable in a foster-based system, where animals may be adopted, become unwell or be otherwise unavailable at short notice. A maximum number of each species is a more practical and accurate figure for planning purposes.

G2Z notes that the role of Animal Management Officers (AMOs) at adoption events requires clarity. AMOs are trained in community safety and animal management, not animal behaviour assessment or clinical health and welfare evaluation. Framing their attendance at adoption events as welfare oversight creates ambiguity about their authority and may not result in better outcomes for animals. Their role should be clearly defined as providing support to the rescue group, ensuring community safety and amenity and confirming that objectively measurable care standards are being met.

Recommendations

- Accept maximum numbers of each species rather than exact numbers in event notifications.



- Include in the notification: APRO name and registration number; event location; the times animals will be on site (including setup); maximum animal numbers by species; name of the responsible person on the day; and emergency vet contact.
- Remove the requirement for the source number of the DAB where the event is planned, as this is not relevant for events at locations other than DABs.
- Clarify through guidance that the role of AMOs at adoption events is to provide support to the rescue group, protect community amenity and safety and to confirm that objectively measurable care standards are met.

5. Management and Care of Animals at Adoption Events

G2Z supports the inclusion of minimum care standards at adoption events. All proposed requirements are reasonable in principle. G2Z recommends that each standard be worded in objective, measurable terms to support understanding and compliance.

Two additional provisions are recommended: one to address animals showing signs of stress (which may not constitute a clinical injury but still warrants intervention), and one to address animals housed with conspecifics to manage social aggression within shared enclosures.

Recommendations

- Retain as proposed: water access requirements; weather protection; enclosure cleanliness; removal of sick or injured animals.
- Modify the pre-event inspection clause to specify that inspection is carried out by the named responsible person, from the notification, for running the event.
- Clarify that animals with pre-existing, non-infectious injuries or conditions cleared by a veterinarian may attend events.
- Add a requirement that animals exhibiting signs of overt distress be given breaks from public interaction (e.g. covered enclosure or removal from the event area) and removed from the event if distress does not resolve.
- Add a requirement that animals housed with other animals must be able to rest and move freely without interference; any animal exhibiting social aggression or fear towards a cohabitor must be moved to an individual enclosure.



- Specify that all animals must have space to move away from direct contact with members of the public while in their enclosure.

6. Animal Fate Data Reporting

G2Z strongly supports collecting and publicly reporting accurate animal fate data across the full companion animal management sector. Transparent data is essential for evidence-based policy and for demonstrating the scale of contribution made by rescue organisations to the Victorian system.

The current proposal creates an inequitable situation in which APROs are required to report more detailed data than councils and shelters, while having access to fewer resources to do so. Many volunteer-run organisations use manual record-keeping or spreadsheets and do not have access to shelter population management software.

The data quality currently being submitted by councils and shelters is also known to contain significant problems: duplication where councils and contracted providers both report the same animals; inconsistent counting methods; and inaccurate fate categories. These systemic data quality issues need to be resolved before new, more demanding reporting obligations are placed on a different cohort of organisations.

G2Z recommends aligning all sector reporting to an established international model, such as the Shelter Animals Count *Intake and Outcome Database* and *Animal Level Data*², which provide clear, comparable datasets. This would give Animal Welfare Victoria a coherent, reliable picture of animal movements across the entire sector.

Recommendations

- Align animal fate data reporting requirements across all organisations covered by the Code and the APRO scheme. APROs should not face more detailed reporting obligations than council pounds and shelters.
- Adopt a recognised, established model for sector-wide data reporting, such as the Shelter Animals Count *Intake and Outcome Database* and *Animal Level Data* to enable consistent, comparable data collection.

² <https://www.shelteranimalscount.org/data-standardization-resources/>



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- Allow all organisations to report on a schedule that suits their operational capacity: monthly, quarterly, biannually or annually.
- Provide practical support including access to shelter population management software and training to enable smaller organisations to meet reporting obligations.
- Resolve existing data quality issues with council and shelter reporting before imposing additional obligations on the rescue sector.

7. Record Keeping

G2Z supports the requirement for APROs to keep individual animal records and to make these available to authorised officers on request. Consistent record keeping is fundamental to accountability and animal traceability.

The proposed requirements should be closely aligned to the Code's record-keeping requirements for shelters and pounds to ensure a consistent standard across the sector. Financial support and access to appropriate software tools are needed to enable volunteer-run organisations to comply.

Recommendations

- Align individual animal record-keeping requirements to those in the Code of Practice for the Management of Dogs and Cats in Shelters and Pounds.
- Animal Welfare Victoria should provide access to population management software and associated training for organisations that cannot independently meet record-keeping requirements.
- Apply record-keeping requirements consistently across all organisations undertaking rehoming activities, including council providers, shelters and veterinary clinics.

8. Veterinary Treatments Before Rehoming

G2Z supports the requirement that animals are desexed, vaccinated and wormed before rehoming. These standards promote consistent, baseline animal health across the sector and provide adopters with clear expectations.

Several practical issues require clarification. First, the proposal does not specify what constitutes an animal that is 'up to date' with vaccinations. Requiring animals to have completed a full



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vaccination schedule before transfer or adoption significantly increases holding times and costs with no proportionate welfare benefit. Animals should be required to be on a current vaccination schedule appropriate to their age and medical history³.

Second, rescue groups currently absorb the cost of veterinary work that should be funded by the council facility from which the animal is transferred. The 84Y Agreements Guidance from Animal Welfare Victoria indicates that shelters and veterinary clinics can charge for services provided under 84Y agreements, while rescue groups are not specifically prohibited from charging but none do so in practice, as this reduces their capacity to provide live outcomes. This funding gap is a systemic issue that the APRO regulations should address directly.

Recommendations

- Add a clause allowing temporary or permanent exemption from desexing or vaccination requirements where a registered veterinarian determines this is not in the best interests of the animal and provides written confirmation.
- Clarify that animals must be 'apparently healthy and up to date with vaccinations as per their age and medical history' rather than requiring a completed vaccination schedule before transfer or adoption.
- Fund Local Government to complete veterinary preparation (microchipping, vaccination, desexing) for animals in their care before transfer to APROs, or provide direct reimbursement to APROs for this work.
- Clarify that if a council cannot access timely veterinary care before transfer, this does not prevent transfer to an APRO.

9. Prohibition and Permission to Rehome Certain Animals

G2Z supports the ethical and transparent rehoming of animals and the intent to protect adopters and the community from animals that pose an increased and/or documented risk. G2Z would support an restriction on the adoption of animals who have caused serious injury to a person, cat or dog, if the wording restricted this clause to situations in which the degree or nature of injury

³ <https://jsmcah.org/index.php/jasv/article/view/42/19>



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inflicted clearly indicates an increased risk of future injurious aggression by that dog or cat when assessed against a published assessment tool, such as that from the ASPCA⁴.

However, the proposed prohibition on rehoming animals with 'known aggression' is too broad and is not grounded in current behavioural science. Aggression covers a wide range of behaviours, from low-level distance-increasing signals to serious injurious bites. Social aggression is a normal part of the behavioural repertoire of healthy dogs and cats and does not predict future dangerous behaviour. A blanket prohibition on this basis would result in the killing of large numbers of animals for whom a safe, appropriately prepared home exists.

The proposed access to the Victoria Declared Dogs Registry for APROs is a useful step, but it addresses only one category of restricted animal. Rescue Groups currently have no mechanism to verify microchip ownership at the point of surrender, meaning they cannot reliably confirm whether a privately surrendered animal is genuinely unowned, has been reported stolen, or has an existing registered owner. This creates legal and reputational risk for APROs that accept surrenders in good faith. The regulations should extend APRO access to the relevant microchip ownership databases so that ownership status can be confirmed before an animal is accepted into care.

The clause permitting rehoming of animals with diseases or defects that do not significantly adversely affect quality of life is supported, but the language should clearly distinguish the role of the veterinarian (to make a clinical determination on whether the pet is currently healthy, has a treatable condition, or a chronic condition that is able to be managed effectively) from the role of the APRO (to determine adoptability given their resources and adoption pool).

Recommendations

- Remove the blanket prohibition on rehoming animals with 'known aggression'.
- Replace with a prohibition on rehoming animals that have caused serious injury to a person, dog or cat where the nature of that injury indicates an elevated risk of future injurious behaviour, as assessed against a published, validated behavioural risk tool.
- Retain and expand the written disclosure requirement to include the full behavioural history of the animal, including documented instances of aggression with context, prior to adoption completion.

⁴ <https://www.aspcapro.org/behaviorpathway>

- Animal Welfare Victoria should develop a standardised template for recording bite history and behavioural information to support consistent practice across councils, shelters and APROs.
- Specify that the veterinarian's role is to assess clinical health and quality of life, while the APRO retains responsibility for adoptability decisions within those parameters.
- Ensure these regulations are consistent with the Behaviour Assessment Guides being developed by the Department.
- Extend APRO access to microchip ownership databases to enable ownership verification at the point of private surrender, reducing the risk of APROs inadvertently accepting stolen or owned animals into care.

10. Information to Be Provided to New Owners

G2Z supports all proposed requirements for information and certifications to be provided to new owners. Microchipping, desexing and vaccination certifications, combined with disclosure of known health and behavioural issues, are a reasonable and important baseline.

G2Z recommends that a formal adoption contract be required, not just a change of ownership form. The adoption contract should identify the APRO, identify the animal, and document all required disclosures. This provides clarity for both parties and creates a record that can be referred to if disputes arise.

The change of ownership requirement should specify the microchip database on which the animal is currently registered to avoid confusion, and the process should accommodate online transfer portals, which are now standard across most registries.

Recommendations

- Require a signed adoption contract that includes APRO contact details and registration number, animal identification details including microchip number, and all mandatory disclosures.
- Specify that the change of ownership be processed through the microchip database on which the animal is currently registered, and that online transfer portals are an acceptable method.



- Require APROs to provide adopters with companion animal care standards consistent with the equivalent requirement for shelters and pounds in the Code. Include guidance on introducing new pets to existing household animals and accessing ongoing support.

11. 84Y Agreements

G2Z strongly opposes the proposal to restrict 84Y agreements to APRO-registered organisations only.

The Victorian sheltering and rescue sector is operating at or beyond capacity. Councils rely heavily on rescue groups and CFCNs to achieve live outcomes for animals in their care, in many cases as the primary or sole live release pathway. Restricting 84Y agreement eligibility will reduce council options for animal placement and, in the current environment, will result in avoidable humane killing.

Analysis of 2024 council pound fate data from councils that do not use contracted providers indicates that rescue groups account for between 15% and 61% of unclaimed animal transfers for dogs, and between 7% and 50% for cats, across a sample of four council areas. These are not marginal numbers. The removal of non-APRO rescue groups from the 84Y pathway would create significant system strain.

Additionally, breed-specific rescue networks affiliated with ANKC breed clubs, which would not qualify for APRO registration, currently provide specialist care for pedigree dogs and cats that may not otherwise be suitable for general rescue placement. Excluding these organisations from the 84Y pathway removes a legitimate, skilled rescue pathway.

G2Z understands that the intent is to give councils confidence about which organisations are operating appropriately. This is a legitimate goal, and G2Z supports providing councils with guidance on selecting reputable partners. However, restricting the formal pathway is too blunt an instrument, particularly given that participation in APRO is voluntary.

Where councils have contracted a pound provider, that provider is under no obligation to partner with rescue organisations and most do not. Where a transfer arrangement does exist, providers



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typically restrict transfers to desexed animals that meet their own adoption criteria and, in some cases, charge the rescue group an adoption fee. The practical result is the same in either scenario: animals that do not meet provider criteria are humanely killed, and rescue groups that do engage face an additional financial cost for achieving a live outcome that benefits the contracted provider's statistics.

Recommendations

- Retain the ability for councils to enter into 84Y agreements with non-APRO pet rehoming organisations.
- Where animals are transferred to non-APRO groups under 84Y agreements, require the council to fund and complete all required veterinary preparation (microchipping, vaccination, desexing) prior to transfer, as per current requirements under the Domestic Animals Act.
- Animal Welfare Victoria should develop and publish guidance for councils on how to assess and select reputable non-APRO organisations for 84Y partnerships.
- Facilitate training for council Animal Management teams on managing external partnerships with community organisations, including development of local stakeholder engagement mechanisms for Domestic Animal Management planning.
- Review the broader Domestic Animals Act framework to ensure councils are given clear guidance that entering into 84Y agreements is an expected component of their domestic animal management obligations, not an optional one.
- Review the current lack of funding contributions to rescue organisations entering 84Y agreements from councils.

12. Microchips

G2Z strongly recommends that all PRO's and APROs are allowed to list their name and contact details on microchip records for animals in their care, rather than individual foster carers. This is essential for the prompt return of animals that escape from foster homes or are surrendered by foster carers, and to establish the legal ownership of the animal clearly. The welfare and traceability benefit of having the owning organisation listed on the microchip does not depend on APRO registration status.



Regarding the signed change of ownership form required at adoption: most microchip registries now operate online transfer portals that capture all necessary information. The requirement for a signed paper form is redundant in most cases and creates unnecessary administrative overhead for organisations that process a high volume of adoptions. The requirement should accommodate online transfer processes and the process should be undertaken by the Rescue Group to ensure it takes place.

Recommendations

- Extend the ability to list organisational name and contact details on microchip records to all pet rehoming organisations, not only APROs.
- Accept online microchip transfer portal processes as meeting the change of ownership requirement in lieu of a signed paper form, and require the transfer is completed by the APRO directly.

13. Cost Recovery Fees for Administering the APRO Scheme

G2Z does not support any fee for APRO registration.

The proposed cost savings used to justify fees do not reflect the operational reality of most CFCNs. Most do not currently pay for animal sale permits (as they do not run DAB-based adoption events), many do not participate in the current foster carer registration scheme due to cost, and the source number cost saving of \$25 per year is negligible. The primary cost offset cited, the 12-month council registration exemption, assumes organisations are currently registering foster animals, which most are not.

The source number benefit warrants closer scrutiny. The source number scheme was designed to allow authorities and prospective owners to trace where an animal has come from. In practice it has not achieved this. Prospective owners and platform administrators on sites such as PetRescue, SaviourLife and Gumtree can confirm only that a number is valid, not which individual or organisation it belongs to. This means a source number provides no meaningful traceability and can be used by any seller to satisfy advertising requirements regardless of legitimacy. Source numbers also change when an animal is transferred between organisations, so they do not reflect an animal's actual origin. A further unintended consequence is that a source number is required to microchip a pet, meaning people who acquire an animal through informal community channels and have no intention of selling it must pay an additional fee when



desexing or chipping their pet. This has added cost to basic veterinary care and created a further barrier to desexing. The automatic issue of a source number upon APRO registration is cited as a benefit worth \$25 per year per organisation. Given the limitations above, this cannot be characterised as a meaningful financial benefit.

Recommendations

- Do not charge an application or renewal fee for APRO registration.
- Conduct a full Regulatory Impact Statement that accurately accounts for volunteer hours, compliance costs, software access costs and the indirect costs of ACNC registration requirements.
- Consider alternative funding mechanisms for scheme administration, including a nominal levy on Local Government councils that benefit from rescue sector capacity.
- Provide clear references for the assumptions underlying the financial modelling in the Consultation Paper to allow for independent assessment of their accuracy.
- Explore whether the Individual Rehoming Grant program can be expanded to provide ongoing financial support to APROs for the cost of veterinary preparation of animals before rehoming.
- Review the source number scheme as a separate matter, including its practical traceability value, its impact on the cost of desexing for community-acquired animals, and whether its current design achieves the policy intent.

Conclusion

The Victorian companion animal management sector has a well-documented structural problem: a heavy and growing reliance on volunteer-run, community-funded rescue organisations to deliver timely, live outcomes for animals that are ultimately the responsibility of councils. Rescue organisations have expanded to fill the gap left by councils that do not operate adoption programs, contracted providers that do not take rescue partners, and a sheltering system that has not kept pace with community expectations.

The benefits to Local Government of this arrangement are significant: improved live release rates, reduced holding costs and length of stay and positive community perception. The costs are borne almost entirely by volunteers and donors. This is not a sustainable system, and regulatory



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reform should not increase the burden on rescue organisations without addressing the underlying causes of that burden.

G2Z supports the principle of proportionate regulation that improves accountability without displacing capacity. The proposed APRO regulations, in their current form, risk doing the opposite: increasing administrative burden to a point where some organisations will cease operations or choose not to participate, concentrating pressure on fewer organisations, and ultimately reducing the system's capacity to achieve live outcomes.

A key test for these regulations is whether they impose equivalent or greater requirements on APROs than on equivalent organisations under the Code. In several areas, notably notification requirements and data reporting, the proposed APRO obligations exceed what is required of funded, staffed organisations. This imbalance should be corrected before the regulations are finalised.

G2Z encourages Animal Welfare Victoria to continue sector engagement, to provide practical compliance support including access to software and training, and to treat the regulatory impact on volunteer capacity as a primary concern in finalising these regulations.

Thank you for the opportunity to contribute to this consultation process. G2Z is committed to working constructively with Animal Welfare Victoria and sector stakeholders to support outcomes that are good for animals, communities and the volunteer organisations that serve them.