



26 September 2023  
Social, Cultural and Economic Committee  
Wellington City Council  
Wellington

**FROM:** Animal Evac New Zealand Trust

**SENT BY EMAIL TO:** [policy.submission@wellington.govt.nz](mailto:policy.submission@wellington.govt.nz)

Dear Committee,

**SUBMISSION ON THE DRAFT ANIMAL BYLAW, DOG POLICY & DOMESTIC ANIMAL POLICY REVIEW 2023**

1. Animal Evac New Zealand (AENZ) is making this submission as part of the Wellington City Council's Animal Bylaw, Dog Policy, and Domestic Animal Policy Review 2023.
2. AENZ is grateful for the opportunity to be involved in this important process. We trust our comments and observations below are of assistance in your consideration of the review.
3. AENZ asks that the Committee note the following, previously published, documents (Annex A), that inform the basis to our recommendations:
  - 3.1. No animal left behind: report to Parliament (Glassey 2019), presented by Gareth Hughes MP.
  - 3.2. A critical evaluation of the companion animal disaster management framework in New Zealand, University of Portsmouth, Doctoral Thesis (Glassey, 2022).
4. AENZ congratulates Wellington City Council's forward thinking on animal management and its leadership in microchipping, desexing, and pet-friendly evacuation shelters over the past few years.
5. AENZ supports the recommendations made in the Policy Review and wishes to provide the following additional recommendations for the Committee's consideration, based on the rationale that protecting animals improves public safety (Annex B).

## 6. Dogs

- 6.1. That dog exercise areas can be designated by the local controller during a civil defence emergency while a state of emergency is in effect. This will remove barriers for evacuees to have their dogs near evacuation or assistance centres.
- 6.2. That an offence be created for impersonation of a disability assistance dog including affixing or using identification that purports the dog to be same.
- 6.3. That the council increases public awareness of the rights and protections of disability assistance dogs, given the increasing trend for emotional or therapy dogs being incorrectly purported the same rights.
- 6.4. That owners seek permission to have more than three dogs (or as per the threshold for multiple dog owner policy requirements), and that the owners should satisfy they have a suitable emergency plan as well as sufficient resources and logistics, to effect the safe evacuation of their animals (i.e. self-reliant).
- 6.5. That during a state of emergency, the local controller can authorise dog control officers from outside the city to render assistance and their powers. This will provide for default surge capacity and encourage mutual aid.
- 6.6. That within relevant policies when dog exercise areas are being designated or reviewed, that consideration be given to include facilities that would enhance the location to be a safe evacuation area. For example, during the 2016 Kaikoura Earthquake, many families from low lying areas in the central city evacuated to Mt Victoria in darkness with all their animals. If the dog off-leash area had had lighting, toilets, Wi-Fi, and water, this would have incentivised evacuation and enhanced public safety.
- 6.7. That dogs impounded during a civil defence emergency are held for an additional 21 days (above the default 7-day period), to allow displaced owners sufficient time to be reunited with their dog. This is consistent to international recommendations such as that of the American Bar Association.
- 6.8. That for the purposes of the proposed Accredited Dog Owner requirements, a NZQA Level 2 or higher qualification in animal care is sufficient in meeting the education requirements given these are more significant and nationally recognised.
- 6.9. That, as already passed by Kapiti Coast District Council (Clause 7.1e, 2019), a bylaw offence is created consistent with “No person shall allow any dog to be

kept in a manner that does not comply with the following minimum standards: Measures must be taken to enable dogs to keep warm in cold weather, cool in warm weather, and safe in extreme weather or during a civil defence emergency". This gives Dog Control Officers powers to act proactively during weather emergencies to prevent harm to dogs. Ideally, this bylaw should be extended to other companion animals covered within proposed policy.

## **7. Cats**

- 7.1. That the number of cats owned by each household is limited unless special permission is granted and, like for dogs, the household should satisfy they have a suitable emergency plan as well as sufficient resources and logistics to effect the safe evacuation of their animals (i.e. self-reliant). A transition period should be put in place for this policy/bylaw. This will enhance resilience, promote responsible ownership, and reduce the risk of animal hoarding.

## **8. General**

- 8.1. That dog registration and other fees collected under the policy may be used for the function and duties of local government animal control under civil defence arrangements, that being the coordination of companion animal care, accommodation, and transport.
- 8.2. That the policy provides for the default position that evacuation centres are to be open to companion animals, as recently declared by Auckland Council during the North Island Weather Event, to give consistency and encourage evacuation compliance.
- 8.3. That during a state of emergency, companion animals should be allowed on public transport for the purposes of evacuation; likewise, policy should not prohibit companion animals from public places being used as an evacuation centre.
- 8.4. That any animal housing facility (veterinary clinics, shelters, pounds, research facility, etc.), must be able to satisfy that they have a suitable emergency plan as well as sufficient resources and logistics to effect the safe evacuation of the animals (i.e. self-reliant).
- 8.5. That animal housing facilities are given periodic approval to operate and that in review of such approval, the financial viability of the entity is reviewed to ensure a hoarding situation or other compromise of animal welfare does not occur.

- 8.6. That during a state of emergency and in the transitional recovery period thereafter, that the policy enables for the humane trapping of displaced companion animals such as those left behind in evacuation zones.
- 8.7. That the policy mandates the council and their agents or contractors (e.g. rubbish collectors, landfill operators), when presented with a deceased companion animal, that they are scanned for a microchip and reasonable efforts are made to notify the owner, including during a state of emergency.
- 8.8. That the policy is future-proofed to take into consideration the use of facial recognition and DNA data in the identification of companion animals for the purposes of reuniting with owners.
- 8.9. That where horses or other equids are kept within the city, that they are microchipped as is done with dogs and cats.
- 8.10. That emergency animal shelters being established during a civil defence emergency must be authorised by the local controller and monitored for welfare and compliance by the council. Under the National Civil Defence Emergency Management Plan Order 2015, the council is responsible for companion animal care, accommodation, and transport. Emergency animal shelters should be part of pre-planned arrangements in conjunction with local emergency management arrangements.

We also would appreciate the opportunity to orally present to the Committee as part of the public consultation process.

**Nāku, nā / yours faithfully**

**Dr. Steve Glassey**

**Patron/Vice-Chair**

**Animal Evac New Zealand Trust**

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## **Annex A: References**

No animal left behind: a report on animal inclusive emergency management law reform (Glassey, 2019)

<https://natlib.govt.nz/records/40128608?search%5Bpath%5D=items&search%5Btext%5D=glassey+emergency>

No animal left behind: A critical evaluation of the companion animal emergency management framework in New Zealand (Glassey, 2022).

<https://animaldisastermanagement.files.wordpress.com/2023/06/binder-no-animal-left-behind-limited.pdf>

## **Annex B: Rationale**

Animals matter in disaster management for several reasons, as outlined below.

**Human-Animal Bond:** Many people have strong emotional bonds with their animals, whether they are pets, livestock, or wildlife. This bond can influence human behaviour during disasters, with people often risking their own safety to protect their animals. Therefore, considering animals in disaster management can enhance public safety by improving evacuation compliance and preventing animal owners from returning to evacuated areas.

**Economic Impact:** Animals, particularly livestock, have significant economic value. Disasters can lead to substantial economic losses due to the death or injury of animals. Therefore, protecting animals can help protect livelihoods and reduce economic impact.

**Psychological Impact:** The loss or suffering of animals in disasters can have a profound psychological impact on people, affecting their ability to recover from the disaster. Therefore, protecting animals can also support the psychosocial recovery of affected communities.

**Ethical and Moral Obligations:** As sentient beings, animals have an intrinsic value and a right to protection from harm. Society has a moral obligation to protect animals in times of disaster.

**Public Confidence and Trust:** Effective animal disaster management can improve public confidence and trust in authorities and meet contemporary societal expectations.

**Legal and Organisational Risk:** Failure to adequately protect animals in disasters can lead to legal repercussions and damage to an organisation's reputation.

**Resilience:** Animals, particularly pets, can enhance resilience by providing physiological and psychological benefits to people.

Therefore, integrating animal disaster management within existing emergency management arrangements is crucial. This includes making animal rescue a core function of traditionally human-centric emergency management entities, ensuring that animals are acknowledged as intrinsically linked to people, and strengthening animal emergency management laws.