

Agriculture and Fisheries and Other Legislation Amendment Bill 2023

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State Development and Regional Industries Committee
Queensland Parliament
Submitted [online](#)

Draft Bill – Dog & Cat Management Act

Australia Post welcomes the opportunity to comment on the draft changes to the Animal Management (Cats and Dogs) Act 2008. These amendments are an important step in reducing dog attack incidents and supporting improved community safety outcomes.

In our submission to the Department of Agriculture and Fisheries Queensland in August 2023 (appendix 1), we provided detail on the significant impacts dog attacks have on our team members and the community. Our submission made seven key recommendations to support team member and community safety, including extending the application of effective control to all locations, larger fines and penalties, and evidence-based campaigns.

We are pleased to see the expansion of effective control to include regulated and non-regulated dogs, and larger fines and penalties for irresponsible dog owners. However, we encourage the Government to consider creating consistency in effective control requirements for dog owners. Specifically, the definition of effective control of regulated dogs (s 192(1)) and for non-regulated dogs (s 192(2)) differ on one key point – effective control is required everywhere for regulated dogs, but only in public places for non-regulated dogs. Effective control on private premises for non-regulated dogs could be as simple as ensuring access to visitors is restricted (e.g., by placing dogs in a separate room).

For a great majority of workers who visit residences, including our postal delivery officers, effective control on the premise is critical regardless of whether the dog is regulated or non-regulated. Australia Post convenes and chairs a cross-industry taskforce with 20 different organisations and businesses. The sentiment across these businesses is consistent with our incident data, and awareness campaigns –that any dog (regardless of breed) has the capacity to cause harm. We have shared images, data, and video footage of attacks on our postal delivery officers with the Department, which demonstrate that any type of dog has the capacity to attack and will do so irrespective of a fence line.

At the time of making this submission yet another team member was viciously attacked by a dog on premise in Pinkenba, QLD. This occurred after the team member had performed a safe drop delivery at the door and was walking towards the gate to leave. Our team member was rushed to the hospital because of the injuries sustained in the attack, which may have been avoided if the dog was under effective control by the owner on the premise.

We believe that there should be a greater focus on effective control for non-regulated dogs, as they make up the majority of dogs and the majority of dog attacks occur on private property when a dog attacks through the front door or in the front yard. This is an important issue, not just for our team members and other businesses visiting residence, but for the broader community. On this basis, we urge the Government to consider the expansion of the definition of effective control to be consistently applied to all dogs, in both private and public spaces.

Thank you for considering our submission.



Australia Post acknowledges the Traditional Custodians of the land on which we operate, live and gather as employees, and recognise their continuing connection to land, water and community. We pay respect to Elders past, present and emerging.

Appendix 1: Australia Post submission to Department of Agriculture and Fisheries Queensland

The Manager, Animal Management
Department of Agriculture and Fisheries
GPO Box 46
Brisbane, Queensland 4001

Re: Submission – Strong Dog Laws: Safer Communities

Australia Post welcomes the opportunity to comment on the Queensland Government’s Discussion Paper on dog laws. The consultation recognises a serious safety issue and presents an opportunity for government and industry to work together to reduce incidents and support improved community safety outcomes.

As Australia’s postal service for more than 200 years, we are at the heart of every community. We have a workforce of more than 64,000 and delivered more than 2.7 billion letters and parcels in FY2023 to over 12.6 million delivery points across Australia. To do this, we employ thousands of Postal Delivery Officers (PDOs), and each of them is at risk of being attacked by a dog.

Dog attack incidents have increased significantly in recent years. In the year ending 30 June 2023, we recorded over 2,500 dog incidents, representing more than a 60 per cent increase on last year. Of these incidents, 52 required medical attention. Our PDOs sustain a range of injuries, including puncture wounds, serious lacerations, scratches, and bites. The attacks can also cause long-term psychological injuries. In the past year, the highest number of incidents took place in New South Wales, followed by Queensland, and Western Australia. In Queensland, we recorded 801 dog attacks in the 2023 financial year. Our data shows that nationally, 50 per cent of dog attack incidents occur on or near a residential property (at the front door, near the letterbox, or in the front yard), while 46 per cent of incidents take place on the footpath.

This experience is not unique to the postal industry. In May, we established a cross-industry taskforce on dog attacks with representatives from more than 20 businesses across the economy including ATCO, Ausgrid, BSA, Club Assist, Coles, Downer, Endeavour Energy, Energy Queensland, Essential Energy, Evoenergy, Greater Western Water, Hire Up, Jemena, Linfox, Mondo, NBN Co, SAPN, ServiceStream, Spotless, Telstra, Uber, UGL Limited, and Woolworths. The key challenges and observations we discussed were consistent – the rules and laws governing dog control and enforcement mechanisms vary between jurisdictions, and enforcement action is often challenging and ad hoc; dog attacks occur on public and private property; collecting and maintaining dog incident data is a challenge; and communicating known risks can be difficult.

It is our experience that any unsecured dog has the potential to be dangerous in certain circumstances. We support the Queensland Government’s proposal to develop a comprehensive community education campaign, to strengthen penalties for owners of dogs that cause harm, and to introduce a state-wide requirement for dogs to be effectively controlled. We also offer the following suggestions to help

reduce incidents and support improved safety outcomes. We would welcome an opportunity to discuss these ideas further.

Recommendations

- **Recommendation 1:** Require dog owners to keep their dog under effective control at all times, even when at home to ensure visitors are protected. Our data shows that most dog attacks occur at or near a residential property. Requiring dog owners to keep their dogs under effective control could greatly improve safety outcomes.
- **Recommendation 2:** Review the options available to local councils to manage irresponsible dog owners, including consideration of a council's capacity to issue larger fines or penalties. This might include requiring owners to complete mandatory training, disqualifying persons from owning a dog, or issuing fines in a wider range of circumstances, e.g., where an owner has failed to adequately restrain their dog or has not prevented the dog from roaming. Councils could also have specialised powers to deal with dogs that are used as weapons.
- **Recommendation 3:** Develop an evidence-based campaign in collaboration with industry that promotes responsible pet ownership and raises awareness of the risks of dog attacks. We also see opportunities for the campaign to be complemented by collateral, including targeted materials for workers who regularly access private property.
- **Recommendation 4:** Introduce signage requirements, requiring dog owners to display signs that notify the public that a dog is kept on the premises. This would help visitors (including workers) make an informed decision about whether to enter the property.
- **Recommendation 5:** Investigate the development of a centralised database for council and industry use that integrates dog registration data, owner details and dog attack incidents. The reporting framework should clearly distinguish between dog attacks and less serious incidents involving dogs. This would ensure risks and enforcement actions are recorded and would provide government with valuable data to support evidence-based policy development.
- **Recommendation 6:** Offer dog registration discounts or other incentives to dog owners who complete accredited dog training courses.
- **Recommendation 7:** Use this consultation process to support the establishment of a national dialogue on dog management.

Australia Post is committed to minimising the risk of dog attacks

Australia Post has implemented a wide range of controls to minimise the risk of dog related incidents. This includes developing safety procedures and guidelines, providing education and training programs to team members, establishing clear reporting processes, and developing internal and external awareness campaigns for team members, customers, and the community.

Over the years, we have trialled several strategies and interventions to address dog attacks, with varying degrees of success. This includes:

- Dog safety checklists
- Training modules
- Facility-based dog registers
- National Dog Safety Campaigns
- Development of an app for hand scanners that delivers a hazard warning at properties where a dog incident has been recorded
- Automated 'secure your dog' notifications provided to customers prior to parcel delivery
- Notifications to customers and local councils following a dog attack incident, with advice that deliveries will cease until customers can demonstrate the dog is appropriately restrained.

A new requirement for dogs to be effectively controlled – at all times

In our experience, any dog has the potential to be dangerous, and it is our view that the regulatory and legislative framework supporting dog management should reflect this. While introducing state-wide effective control requirements is an important step in strengthening the dog management landscape, this should be applied at all times (i.e., to both public and private places). Our data shows that most dog attack incidents occur at a customer's home, often in the presence of an owner. Requiring owners to keep their dogs under effective control at all times is likely to significantly reduce the risk of a dog attack. In practical terms, this may involve appropriate fencing, keeping dogs indoors or other forms of control (e.g., restricting the dogs access to the front door when a visitor approaches). Extending effective control requirements in this way would encourage dog owners to be accountable and help ensure individuals, including workers, are protected.

Well resourced local councils with the necessary powers to manage dangerous dogs and irresponsible dog owners

A robust legislative framework with clear enforcement mechanisms is an important part of ensuring dog owners remain accountable for their dog's behaviour. A dog attack can be a traumatic experience that results in significant physical and psychological injuries, such as scarring, disfigurement or post-traumatic stress (see Appendix 1).

Securing penalties against irresponsible owners or seeking formal legal redress can be challenging as an employer, as well as distressing for victims and dog owners alike. The pathway to enforcement action is complicated and may be influenced by differences in local council regulations and levels of resourcing. We encourage the Queensland Government to review the options available to local councils to manage irresponsible dog owners, including consideration of a council's capacity to issue larger fines or penalties. This might include requiring owners to complete mandatory training, disqualifying persons from owning a dog, or issuing fines in a wider range of circumstances, e.g., where an owner has failed to adequately restrain their dog or has allowed the dog to roam. Councils could also have specialised powers to deal with dogs that are used as weapons.

We also encourage the Queensland Government to consider giving courts the power to order that fines and/or compensation be paid directly to victims of dog attacks.

As with any penalty, it will be important to get the balance right and ensure that measures do not disproportionately impact vulnerable people or communities. Council workers, dog rangers and other persons authorised to administer dog management policies should be trained to identify this risk.

An evidence-based campaign to promote responsible dog ownership

Educational campaigns aimed at preventing dog attacks offer numerous benefits for both the community and dog owners. A campaign can raise public awareness of dog behaviour, the warning signs of aggression, the number of dog attack incidents, safe containment measures, and responsible pet ownership. Educating the public about potentially dangerous interactions, including the risks around approaching unsupervised dogs, could reduce the number of dog attacks. Campaigns can also be used to promote a more balanced view of dog ownership that focuses on dog behaviour instead of dog breed stereotypes, helping the public to understand that all dogs have the potential to be dangerous, and that training and socialisation is important for all dogs, not just select breeds.

Australia Post runs two national dog safety campaigns each year to raise public awareness of this issue. The external media campaigns highlight the impact dog attacks have on our PDOs, along with providing dog owners with useful tips for how they can help prevent these attacks. While these campaigns have been successful with respect to the media coverage across print, radio, TV, and online (totalling more than 1,080 clips with a total combined audience reach of 14.5 million), there is no material decline in the number of dog attacks. The next dog safety campaign will take place in October with the support and collaboration of the cross-industry taskforce.

In 2022, we printed and distributed more than 1.4 million dog safety postcards, with key messages including ‘even good dogs have bad days’, ‘get your parcels delivered safely’, and ‘help protect your pets, your postie and your neighbourhood’. We also invest heavily in dog safety training and materials for our team members, educating them about canine behaviour to help minimise the risk of an attack. While we continue efforts to protect our workers, increased awareness, and education of the community – as well as strong laws in this space – is also required. We would welcome any opportunity to collaborate with the Queensland Government on its education and awareness campaigns.

Placing warning signs on all entrances to a dog owner’s property

Requiring households to place a warning sign at the entrance of their property, notifying the public that a dog is kept on the premises, is one way to ensure that visitors make an informed decision about whether to enter the property. Signs could be issued at the same time a dog is registered with the local council and would be required for all dogs regardless of their breed or status.

Data about dog attacks is important for developing evidence-based policy

We recognise that collecting and maintaining dog attack data is challenging. Information about the nature of injuries or the circumstances in which an incident took place may be ad hoc or incomplete. Dog owners and victims alike, might choose not to report an incident, making it difficult for local councils to develop a complete or accurate picture of dog attack risks.

In New South Wales (NSW), an animal register is maintained by the state government. This includes data about all dogs registered in the state and all dog attacks reported to local councils. Under NSW regulations, councils are required to record information about dog attacks on the register, including a requirement to report dog attacks in their area within 72 hours of receiving the information. A register like this which provides access to industry, would be helpful for businesses to develop tailored risk mitigation strategies, including independent assessments to determine if the site should be visited or not.

We encourage the Queensland Government to consider a similar initiative, by establishing a centralised database that integrates dog registration data with owner details and dog attack incidents. Establishing a single data repository would provide government with valuable data to support evidence-based policy development and would provide helpful insight to identify trends and risks.

Incentivising compliance and responsible pet ownership with discounts

Best practice animal management involves helping people to achieve voluntary compliance with laws and regulations. This could include subsidising services (e.g., immunisation, desexing, microchipping) or offering discounts on annual registration fees when owners complete accredited dog training courses or attend responsible pet ownership seminars (ideally hosted by local councils). These initiatives not only encourage voluntary compliance but can also be used to build positive relationships with local authorities.

Working together to improve dog management

Australia does not have a single unified approach to dog control and management. Dog management policies and regulations are managed by state and territory jurisdictions and may be applied differently by each local council. While there are some similarities in the general principles and objectives, there are also notable differences in specific regulations and requirements. This consultation could be used to start a national conversation, and we would happily play a role in supporting the Queensland Government to establish a cross-jurisdictional dialogue on dog management.

A harmonised regulatory framework would be an excellent first step in supporting safety for all workers in Australia.

We thank the Queensland Government for the opportunity to participate in this consultation and would welcome an opportunity for collaboration between our taskforces for example through a roundtable discussion.

To discuss this submission further, please contact Kat Burela, Head of Industry, Policy, and Regulatory Affairs at [REDACTED]

Appendix 1

Figure 1: Leg wound following a dog attack.



Figure 2: Arm wound following a dog attack.



Figure 3: Still from video footage showing an aggressive dog charging a PDO.



Figure 4: Still from video footage showing a dog jumping a fence.

