

**21 May 2025**

Assistance Animal Principles  
Advocacy and Inclusion Programs Branch  
Department of Social Services  
GPO Box 9820, Sydney, NSW 2000

Delivered by email to [sector.engagement@dss.gov.au](mailto:sector.engagement@dss.gov.au)

To Whom it May Concern,

## **Re: Assistance Animal National Principles**

People with Disability Australia (PWDA) is pleased to respond to the Department of Social Services regarding their work with states, territories and other Government agencies to develop draft **National Principles** for the regulation of Assistance Animals.

**People With Disability Australia** (PWDA) is Australia's national peak disability organisation, representing the 1 in 6 Australians with disability. We are the leading disability rights advocacy and representative organisation and the only national cross-disability organisation representing the interests of people with all kinds of disability. We are a not-for-profit and non-government organisation, and our membership is comprised of people with disability and organisations primarily constituted by people with disability, including the **PWDA Board** and many members of **our staff**.

In March 2025, PWDA joined with other advocacy organisations led by the Australian Autism Alliance, in a **joint statement** calling for the establishment of a National Assistance Animal Framework to meet the needs of people with disability and remove inequitable access barriers. We appreciate this opportunity to provide direct response to the draft National Principles for the regulation of Assistance Animals.

# The draft National Principles for the regulation of Assistance Animals

PWDA agrees in principle with the Department of Social Services draft National Principles for the regulation of Assistance Animals as outlined in the [consultation paper](#), which are:

1. nationally consistent accreditation requirements for assistance animal trainers and/or training organisations
2. nationally consistent minimum assistance animal training standards
3. a single national Public Access Test for assistance animals
4. nationally consistent requirements for evidence of disability and a need for an assistance animal (noting this must have consistency with other federally led disability evidence requirements)
5. national identity card and logo, and
6. wellbeing of the assistance animal, including during and after its working life.

However, the above principles must be contextualised and considered in a way that best serves the needs of people with disability, and addressing key issues provided in this letter submission.

## What we have heard

To support our understanding and response, PWDA undertook research interviews with Australian assistance animal handlers and trainers, who have a diverse set of experiences and opinions.

The people we interviewed raised a number of important, but different issues. The first interview with a guide dog handler highlighted ongoing issues of refusal, as well as problems when other assistance animals behaved in ways that threatened their dog. They supported the development of National principles and wanted training of customer-facing staff to ensure that assistance animal handlers would not experience exclusion and discrimination in public places.

The second interviewee who had self-trained their assistance animal to assist with their Autism did not think a national card would reduce discrimination, and they believed current Federal law already provided protection. They wanted ways to recognise self-trained assistance animals, including those already in use, and affordable access to assistance animals for people with disability who have low incomes. They also called for study of the number, scope, needs and variety of assistance animals.

The third interviewee who helped people who had self-trained have their assistance animal recognised and was a trainer themselves, felt that the priority should be reducing conflicts between existing laws and the needs of assistance animal handlers. They felt that national principles and a card would not remedy these issues.

The fourth interviewee was also an assistance animal trainer and supported the development of national principles. They called for quality training to be made available to those training assistance animals, and for the application of clear, consistent animal welfare standards to be applied to assistance animals.

Each of the interviewees, provided valuable and quite different perspectives that reflect the concerns and issues highlighted by members and through our advocacy work for people with disability. We have provided Interview Summaries as an appendix.

## Our Peers

PWDA supports the work of the Australian Autism Alliance, who are seeking to expand the recognition of, access to, and support for the wider use of assistance animals for people with disability. This expansion would recognise that there is a wider cohort of people with disability who could benefit from assistance animal supports and engagement. We agree that requirements under the National Disability Insurance Agency ('NDIA') **Assistance Animals operational Guideline** are currently too limiting, in that they have the effect of:

- preventing people who have a disability or health condition that is co-occurring with post-traumatic stress disorder from accessing an assistance animal that could help them
- excluding funding to enable people with psychosocial disability from accessing assistance animals

- failing to recognise other valuable tasks assistance animals could perform for people with disability beyond providing physical, vision or hearing assistance

PWDA agrees with our peer organisations that a wider understanding of assistance animals, and the valuable work they can do, needs to be incorporated into the national principles.

## Wider considerations

PWDA co-chairs with the Australian Federation of Disability Organisations (AFDO) and the Federal Department of Infrastructure, the steering group working on drafting the Disability Aviation Standards. Australia needs nationally consistent assistance animal standards not only to make it easier to move between states for residents with disability, but also for the many visitors to our shores.

Nationally consistent principles will provide much needed clarity to airports and airlines, that will help them train staff, serve customers and provide a more inclusive and accessible travel experience. From a technical perspective it will also help those designing aircraft, other public transport vehicles and the enabling infrastructure and environment, with clear processes and training to plan for the movement of, carriage and safe restraint of the types of animals that will be needed.

## Our recommendations

Assistance animals offer the opportunity for people with disability to achieve greater independence and inclusion. However inconsistent laws, rules, processes and understanding have contributed to inaccessibility and discrimination.

In light of what we have heard, and the information provided in this submission, PWDA makes the following recommendations for the development of the Assistance Animal National Principles:

- 1) Provision must be made to enable the training and accreditation of assistance animals nation-wide, including in rural and regional Australia. This could include:
  - making handler training available, without a “post code lottery” barrier, to enable a person to become accredited and train their own animal

- enabling (and paying) veterinarians to certify PAT tests, perform regular health and welfare checks on the animal,
  - enabling veterinarians, vet techs or accredited assistance animal trainers to certify the suitability of a person with disability and an assistance animal for each-other and the tasks required
  - providing for the acceptance and evaluation of evidence, that does not require direct physical contact, such as video, that an assistance animal has met the requirements of accreditation
- 2) The cost, administrative and procedural burden of training and accrediting an assistance animal must not be set so high as to exclude people with disability from low socio-economic environments and low incomes from accessing and assistance animal
  - 3) In setting parameters for the age, work-life duration, health and welfare standards, and suitability of species to be used as assistance animals, that the **Australian Veterinary Association** be consulted. Its advice should guide the development of the national enforceable principles to ensure the welfare of animals is prioritised and protected
  - 4) The National Disability Research Partnership, or a similar disability-led research organisation be commissioned to conduct research into the numbers, types, functions provided, needs, welfare of assistance animals, and experiences of their handlers, trainers and the wider sector
  - 5) The research be evaluated and used to inform ongoing evolution of the national principles and any additional training, regulation or legislation needed to give effect to them
  - 6) That the principles undergo review every two years based on research, reporting and the experience of people with disability

PWDA supports the development of the Assistance Animal National Principles. We recognise that to meet the needs of people with psychosocial disability, it is likely that a greater number of assistance animals, meeting a wider range of needs, will be necessary.

PWDA recommends that the Assistance Animal National Principles be considered a 'living document', to be amended on a bi-annual basis based on evolving research, reporting and consultation.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Megan', with a stylized flourish extending from the end.

**Megan Spindler-Smith**  
**Deputy CEO**  
**People with Disability Australia**

## Appendix 1 - Interview Summaries

### Interview 1

A guide dog handler of 30 years raised the issue of refusals, most commonly by taxi and ride-share drivers, followed by food service outlets (cafes, restaurants, hotels). They raised the need for better training of workers who have recently arrived in Australia and may not be aware of the rules. In the case of food service businesses, workers are specifically told that animals cannot be around food, and they do not understand the exception for guide dogs or assistance animals.

They had experienced previous difficulties with the behaviour of other assistance animals towards their guide dog in public places. The handler welcomed the establishment of the principles so that managers of public facilities could better understand what to do in situations where an animal was not behaving as an accredited assistance animal should. This aligns with the provisions of the Disability Discrimination Act which focuses on animal behaviour, not accreditation.

They welcomed:

- consistent uniform standards to make travelling interstate easier
- a national card that provides access for the person and their assistance animal
- animal welfare standards for all animals that ensure the animal's health and suitability to continue working.

They expressed concerns about the card if it required the disclosure of the person's disability, the details of which should remain private. However, they were open to it being a photo identification with a QR Code linked to the legal requirements related to assistance animals.

### Interview 2

A person who had self-trained their own animal to assist them, following an adult diagnosis of Autism. Their dog was trained to assist them in crowds by helping create space, to assist them in preventing a 'melt-down', or to bring them back if one occurred. They

followed the principles of the public access test (PAT) when training the dog in the tasks they needed.

Having their assistance dog meant that this person was able to go out in public for the first time in a decade, to travel and to connect with others. Whilst they could see potential benefits in having a national card, from the perspective of needing to carry less evidence, this handler expressed concerns that:

- ID Card holders are already discriminated against in some states, and a national card won't fix discrimination
- Federal law already exists that protects people who use assistance animals, and that takes primacy
- assistance animal accreditation processes are too expensive, and need to be free
- many people do not have affordable access to the people and organisations that can accredit assistance animals or conduct PAT tests- they were open to using a video log of training or other evidence
- people who already have assistance animals are concerned that bringing in a new process may mean their animals are taken away from them or not recognised
- there is no current, clear understanding of the size and scope of assistance animal usage in Australia, this needs to be researched and understood
- a plan be developed to introduce a national scheme, this shouldn't be rushed
- national plans must not exclude owner-trained animals
- mandatory retirement ages may be brought in for assistance animals.

This handler discussed the barriers people in rural and regional areas faced to accessing assistance animal training and accreditation, and expressed concern about cost as a barrier as many people with disability live on low incomes.



## Interview 3

We interviewed a person who was an assistance animal handler, trainer and advocate. They help people train their own dogs to assist them, and they support and advocate for people who 'self-attest' under the Disability Discrimination Act.

This handler/trainer liked the idea of nationally consistent policy, but expressed concerns that:

- the proposed process could lead to incoherent policy and communication by the states, potentially leading to training providers being ill-equipped to meet the standards
- non-canine assistance animals were recognised by some states but may not be under the National Principles
- around half of all assistance animals are not trained by large providers of guide and hearing dogs, but training organisations for these dogs may get a greater say in shaping policy
- there are too few accredited assistance animal trainers to meet current demand
- an animal may be able to perform the tasks a person with disability needs, but not complete a PAT test
- States have inconsistent laws, rules and practices and these need fixing before National Principles are developed
- Who pays under a new national scheme?

This handler/trainer emphasised that national principles would not fix discriminatory practices or conflicts between laws, rules, procedures and processes at a State or local level. They called for this work to be done first.

## Interview 4

We interviewed a person who trained assistance animals and who had contributed to the co-design of assistance animal training certifications. They were keen to see National

Principles developed and welcomed the opportunity to ensure people who wanted to train assistance animals had access to quality training.

They expressed concerns that:

- the current more permissive approach could mean that some animals were not being trained using techniques that prioritised their welfare
- people who did not have the money to train an assistance animal properly or have it PAT tested, may also lack the resources to care for it properly
- regular veterinary welfare checks be carried out
- assistance animals be allowed to be retired in old age, or when health issues prevent them from working
- people in rural and regional areas have access to assistance animals, and that they be able to undertake education so that they can self-train the animal
- poorly trained animals may hurt other animals or people, and this would be of no benefit to the handler and could lead to reduced support for assistance animals
- animals who are selected to provide assistance should be of a size, species and breed that is safe for the circumstances and assigned tasks, taking into particular consideration the needs and welfare of the animal