

11th December, 2023

Department of Climate Change, Energy, the Environment and Water

Email: invasivespecies@dcceew.gov.au

RE: Draft Updated Threat Abatement Plan for predation by feral cats

Animal Care Australia (ACA) is a national incorporated association established to consult with government in advocating for real animal welfare by those who keep, breed and care for animals. Our goal is to promote and encourage high standards in all interactions with the animals in our care.

As a nationally recognised animal welfare organisation, committee members of Animal Care Australia have experience in the issues directly relating to the ownership and breeding of domestic cats, and in addition, free-roaming, community-maintained and feral cats.

The challenges of the management of feral cats are vast and has long divided many people and communities in Australia with opposing views on the solutions.

The Threat Abatement Plan (TAP) appears to have no new strategies other than what is currently available by state and territory governments. This paper seeks to create a federal version which all states/territories would be required to abide by.

Animal Care Australia makes the following recommendations:

- **Animal Care Australia SUPPORTS the summary points of the TAP.**
- **Animal Care Australia strongly OPPOSES allowing individual councils to set cat free suburbs**
- **Animal Care Australia strongly opposes providing Local Councils with greater powers – particularly in placing household limits on pet ownership.**
- **Government needs to monitor invasive species and develop achievable management plans rather than relying on quick cost effective – short-term measures.**
- **Animal Care Australia strongly recommends the inclusion of representation of pet cat keeping organisations on this Taskforce. Animal Care Australia welcomes the opportunity to provide that inclusion and consultation.**
- **Animal Care Australia strongly recommends the inclusion of representation of pet cat keeping organisations within the Practitioner and Resources Network.**
- **Animal Care Australia supports maintaining, enhancing and updating Codes of Practice and Standard Operating Procedures, with the caveat that all stakeholders and affected community groups must be consulted during any review, development, or implementation.**
- **Animal Care Australia supports refining the use of existing tools, and to develop new tools, for directly controlling feral cats, and make the tools appropriately accessible, with the caveat that all reports and research results are publicly released for stakeholder feedback.**
- **Animal Care Australia welcomes and supports the inclusion of the following with the Threat Abatement Plan and we hope this is a requirement that all states and territories must adopt:**
 - **Mesopredator control by dingoes: Carry out research to evaluate how dingo management could affect feral cat abundance and impacts and the consequences of such effects on threatened species and ecosystem resilience, and then develop costed options for landholders at regional scale.**
 - **Toxic baits (Eradicat, Curiosity, Hisstory) and alternative toxin presentations (e.g., Felixer) are registered and available for use in those parts of Australia where their use is justified based on the biodiversity benefit, overall humaneness, and sustainability.**

- **The biodiversity benefits, and attendant risks, of shooting, trapping, and tracking for controlling cats, in different contexts, are better quantified.**
 - **The use of guardian dogs to repel cats from sites supporting populations of cat-susceptible species has been trialed and evaluated.**
 - **The potential to develop synthetic biology (e.g. immunocontraception, gene drives) to reduce populations of cats is explored.**
 - **Improved understanding of the extent to which cat recognition and avoidance by native prey species can be encouraged via managed selection.**
- **Animal Care Australia STRONGLY SUPPORTS a One Health approach by all parties invested in the implementation of the Threat Abatement Plan**

Animal Care Australia provides the following stand-out points of the Threat Abatement Plan:

- ❖ Cats in populated cities, towns and rural properties are referred to as ‘stray cats’ in the consultation paper but fall under the “feral cats” definition in the consultation paper. Management of stray and feral cats in these locations must be different due to the human demographic and proximity to other companion animals and wildlife.
- ❖ Given the Threat Abatement Plan is a 30-year objective with further reviews and framework being established over the next 5 to 10 years, funding plans should be prioritised to ensure accurate and ongoing monitoring and research.
- ❖ Poison baits are currently being used, and there will always be a measure of pain caused by ingesting a poison designed to kill. A continued review of all stages of the poison life cycle must be undertaken to improve methods for future years.
- ❖ The consultation draft refers to a robust estimate, based on research, of 1.4 to 5.6 million cats categorised as feral within Australia. This is a substantial discrepancy of 4.2 million cats which suggests that the research and data modelling is not as robust as presented.
- ❖ There is no financial information regarding the cost per year (or over the past 5 years) that has been spent on feral cat management plans or where the funding has been derived from.
- ❖ The most substantial cost relates to Objective 6 for creating safe havens, protection and fencing at a cost of \$42,050,000 over a 5-year period. The total estimated costs for all of the actions and objections in Table 20 on Page 82 is \$60,100,000, and yet there is no information as to where this funding is going to come from, how it will be used and what the success rate for implementation is likely to be.
- ❖ There are no statistics reported in the consultation draft (Sept 2023) as to the effectiveness of the abatement plans currently in place on decreasing the number of feral cats in locations of human habitation or infrastructure (towns, cities, rural).
- ❖ Any version of euthanasia must be humane, and any pain, discomfort and distress must be minimised as far as possible. There is ongoing debate as to the humaneness of using poisons in baits, the level of pain they cause as the animal dies and impacts on non-target species such as wildlife.

Animal Care Australia has provided detailed responses to many facets of the TAP within the submission attached.

Animal Care Australia thanks the DCEEW for this opportunity and we welcome any questions you may have as you continue to finalise the outcomes of this review.

This submission can be publicly listed.

Kind regards,



Michael Donnelly
President
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About Animal Care Australia

As a nationally recognised animal welfare organisation, Animal Care Australia encourages continued development of animal welfare standards and Codes of Practice for animal husbandry, breeding, training, sale, and sporting exhibitions for a wide range of animal species, including pets, animals used for educational or entertainment purposes or kept for conservation, and in particular native birds, reptiles, and mammals.

Animal Care Australia was founded in early 2018 to establish an organisation run solely by volunteers to lobby for real animal welfare. With extreme animal rights and animal liberationist ideologies influencing government legislation, regulation, and policy at our expense and to the detriment of our animals and pets, it has become necessary to provide government with a balancing voice.

By uniting the broad spectrum of animal groups, collectively we offer an experienced, sensible approach to animal welfare. We estimate our foundation Animal Care Australia's member clubs currently represent well over 150,000 members and that is just in NSW alone!

By educating our members and the public about the importance of treating animals with kindness and respect for their needs and promoting the humane treatment of animals to improve animal welfare outcomes, Animal Care Australia is in the unique position of lobbying and advocating for all animals within our care.

Animal Care Australia provides priority to the following:

- lobbying government for stronger welfare outcomes
- lobbying government to increase education of the public in animal welfare and best care techniques
- educate the public on handling their animals with kindness & respect and the importance of their needs
- educate the public in the differences between animal welfare and animal rights

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Animal Care Australia submission

Approved: 10th December 2023
“Animal welfare is animal care”



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ACA Background

Animal Care Australia Inc. (ACA) represents the interests of all hobbyist and pet animal keepers nationally. Our members are comprised of most major animal keeping representative bodies including those representing dogs, cats, birds, horses, small mammals, reptiles, fish and exhibited animals. Some individual members also work in the rescue, care, and rehabilitation sectors.

Supporting statement

As a nationally recognised animal welfare organisation, committee members of Animal Care Australia have experience in the issues directly relating to the ownership and breeding of domestic cats, and in addition, free-roaming, community-maintained and feral cats.

The challenges of the management of feral cats are vast and has long divided many people and communities in Australia with opposing views on the solutions.

The Threat Abatement Plan (TAP) appears to have no new strategies other than what is currently available by state and territory governments. This paper seeks to create a federal version which all states/territories would be required to abide by.

TAP is primarily directed towards feral cat management in natural environments and not in urban locations – Animal Care Australia has concerns with this approach – as feral cats cause concern and issues in all locations. It also raises questions as to whether the TAP is purposely choosing to ignore urban issues in order to avoid the ongoing debate relating to TNR (Trap, Neuter & Release/Rehome) initiatives?

Animal Care Australia supports each of the following Summary points, with additional clarification:

This threat abatement plan has been developed, and should be implemented, in accordance with the following principles:

- 1) Stakeholder groups with interests in cat management and welfare should be respectfully engaged.*
- 2) The management of feral cats should incorporate and support the management objectives and expertise of Indigenous Australians.*
- 3) Programs to reduce cat impacts should use actions that are justified by optimising biodiversity outcomes, overall humaneness, and the sustainability of the action(s).*
- 4) Cat management should occur within an evidence-based and adaptive management framework, where monitoring leads to continual improvements in knowledge and refinement of management actions.*

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5) Cat management should consider a broad ecological context, including potential consequences on other feral animals, and be conducted in a manner that integrates pest control for biodiversity outcomes.

6) The priority accorded to the management of feral cats should be commensurate with the ongoing severe impacts of cat predation on much of Australia's fauna, including many threatened species, and with the magnitude of beneficial impacts likely to arise from cat control.

Summary Point 1: Animal Care Australia must be recognised as a key animal welfare stakeholder at a national level in alignment with our current states and territory-based recognition.

Summary point 4: the 'adaptive management framework' must include funding for research and trial-based studies into more humane alternatives in order to replace the current use of 1080, PAPP, and other inhumane practices. Contemporary studies now show their use is having a greater and far-reaching impact than initial studies implied. The initial studies on the whole were completed and/or funded by either the key poisons manufacturers, the livestock sections of the farming industry or other beneficiaries of the use of said chemicals. The governments of Australia have been too exclusively influenced by these parties and have blindly continued to follow them rather than current evidence-based studies and findings.

Summary point 5: The 'potential consequences' must include consequences on other domestically kept animals including family-owned cats and barn (farm) cats.

Summary of feedback

Animal Care Australia provides the following stand-out points of the Threat Abatement Plan:

- Cats in populated cities, towns and rural properties are referred to as 'stray cats' in the consultation paper but fall under the "feral cats" definition in the consultation paper. Management of stray and feral cats in these locations must be different due to the human demographic and proximity to other companion animals and wildlife.
- Given the Threat Abatement Plan is a 30-year objective with further reviews and framework being established over the next 5 to 10 years, funding plans should be prioritised to ensure accurate and ongoing monitoring and research.
- Poison baits are currently being used, and there will always be a measure of pain caused by ingesting a poison designed to kill. A continued review of all stages of the poison life cycle must be undertaken to improve methods for future years.
- The consultation draft refers to a robust estimate, based on research, of 1.4 to 5.6 million cats categorised as feral within Australia. This is a substantial discrepancy of 4.2 million cats which suggests that the research and data modelling is not as robust as presented.

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- There is no financial information regarding the cost per year (or over the past 5 years) that has been spent on feral cat management plans or where the funding has been derived from.
- The most substantial cost relates to Objective 6 for creating safe havens, protection and fencing at a cost of \$42,050,000 over a 5-year period. The total estimated costs for all of the actions and objections in Table 20 on Page 82 is \$60,100,000, and yet there is no information as to where this funding is going to come from, how it will be used and what the success rate for implementation is likely to be.
- There are no statistics reported in the consultation draft (Sept 2023) as to the effectiveness of the abatement plans currently in place on decreasing the number of feral cats in locations of human habitation or infrastructure (towns, cities, rural).
- Any version of euthanasia must be humane, and any pain, discomfort and distress must be minimised as far as possible. There is ongoing debate as to the humaneness of using poisons in baits, the level of pain they cause as the animal dies and impacts on non-target species such as wildlife.
- The NSW code of practice for the effective and humane management of feral cats (published in March 2022¹) states that their experience with baiting in large areas is not effective. Cat management areas of human habitation or infrastructure (urban, towns, cities, rural) must be handled differently due to the proximity of pet cats (and other companion animals) and humans.

Responses to abatement plan

2.1 Pre-consultation with Feral Cat Taskforce and Indigenous land managers: National Feral Cat Taskforce

Animal Care Australia appreciates the level of ongoing feral cat consultation conducted by the Australian Government - Department of Climate Change, Energy, the Environment and Water, Threatened Species Commissioner, however we note the lack of representation of domestic cat keeping organisations. This abatement plan highlights the fact that some domestic cats continue to expand the feral cat population and yet there is no organisation that can speak to that directly on this taskforce?

RSPCA Australia is also listed as a member of the Taskforce as an animal welfare organisation and Animal Care Australia strongly disputes that to be the case. RSPCA state-based organisations are not

¹ [NSW Code of Practice for effective and humane management of feral cats](#)

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only wiping their hands of involvement with dealing with ‘free-roaming’ cats entering their facilities – their policies are predominantly animal rights based and not the improvement of animal welfare.

3.1 Cat definitions

Animal Care Australia acknowledges the difficulties in correctly identifying and applying definitions to cats across the country. However, we find it irresponsible of this Plan to simplify the definitions down to just two:

1. Feral Cats
2. Pet Cats

It is important to note that there must be a clear distinction between feral cats in natural environments VS feral cats in populated and urban areas, and that the methods of abatement MUST be different.

Cats in populated cities, towns and rural properties are referred to as ‘stray cats’ in the consultation paper but included as a subset of ‘feral cats’, and yet they are more likely to be lost pet cats. Management of stray and feral cats in these locations must be different due to the human demographic and proximity to other companion animals and wildlife. The recent consultation in Victoria during their ongoing development of a ten-year cat containment strategy highlighted the complications of trying to reduce the definitions, and in doing so complicating the responses and strategies available. A similar debate in NSW occurred during their ongoing review of the Companion Animals Act. Simplified definitions just simply cannot apply accurately to the many varied situations.

‘Pure feral cats’ that live and exist in natural environments have adapted to being able to survive without human intervention, and breed at higher rates as there are no mechanisms for desexing, unlike those available to feral cats (stray cats) within urban and peri-urban areas.

For these reasons and more, Animal Care Australia strongly recommends the TAP recognises and utilises the definitions provided on pages 7 and 8 of the Background Paper:

- Domestic – all cats with some dependence (direct or indirect) on humans, with three subcategories:
 - Owned – these cats are identified with and cared for by a specific person and are directly dependent on humans. They are usually sociable although sociability varies.
 - Semi-owned – these cats are fed or provided with other care by people who do not consider they own them. They are of varying sociability with many socialised to humans and may be associated with one or more households.
 - Unowned – these cats are indirectly dependent on humans with some having casual and temporary interactions with humans. They are of varying sociability, including some who are unsocialised to humans, and some may live in groups (e.g., common

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aggregation sites including rubbish tips, food outlets, coastal fishing spots associated with urban environments etc).

- Feral – these cats are unowned, unsocialised, have no relationship with or dependence on humans, and reproduce in the wild.

3.3 Cat distribution and abundance

Animal Care Australia notes the consultation paper refers to a ‘robust estimate, based on research, of 1.4 to 5.6 million cats categorised as feral within Australia’.

This is a substantial discrepancy of 4.2 million cats which suggests that the research and data modelling is not as robust as presented. The provided excuse of ‘environmental conditions’ may constitute a level of difference in survivability and birthing of cats during harsher conditions – however the paper also goes out of its way to state the numbers are ‘estimates’ and yet fails to provide supporting data that it claims these estimates are based on.

4 Cat impacts

Animal Care Australia supports the findings and data provided within this section. We make additional comments:

4.4 Public amenity

Animal Care Australia notes the following statement: *“Local government staff also noted that the ‘leakage’ of pets into the feral population was a serious problem and considered that pet cat management was an important component of managing feral cats. However, respondents stated that cat management was very challenging, because they lacked the resources to manage feral cats adequately, and because managing pet cats was constrained by uneven levels of awareness of cat impacts among the community, uneven levels of support for responsible pet ownership practices among the community, and inconsistent and weak legislation and regulation across government jurisdictions that affected the ability of local government to enforce compliance. The survey report found that local governments on mainland Australia and Tasmania spend over \$76 million annually on pet and feral cat management.”*

While Animal Care Australia agrees with the points made by the Local Government findings, we must question the validity of spending \$76 million annually on cat management that is so clearly flawed? The money would be far more beneficial being diversified across a multi-faceted approach that is in direct response to the issues raised – such as:

- Education campaigns promoting responsible pet ownership to their residents
- Enhanced free desexing clinics for all residents

- Promotion of the benefits of cat containment and support to residents that opt to contain cats to their property. This support could come in the provision of discounted cat enclosures and free Council advice of construction and zero DA fees for residents who implement cat containment on their property.

Reduce the supply of and ability to free-roam and you reduce the number of feral or stray cats within the shire. Reduce the numbers, you reduce the expenditure. Proactive responses instead of reactive responses would go a long way in combatting the problem.

4.5 Indigenous cultural values

“... Many (consulted) groups also noted many people in their communities made a distinction between feral cats and community cats, and that the number of community cats was increasing.”

This issue is due to a gap in legislation that does not provide for more than one person to be recognised as the owner (person responsible for) a cat or cats. Community cats are often left as entire cats because there is no legal obligation or ability to ensure these cats are being maintained properly.

Natural cat behaviour is also a contributing factor to ensuring greater legislative measures must be introduced. Community cats will still free-roam and prey/play with native wildlife, with no consequences or accountability for those maintaining the cat population.

Cats that are rescued by individuals are often afraid to take them to Council facilities as they rightly know the cats will be immediately identified as ‘feral’ and euthanised. Therefore, the cats are more often than not left to free roam as a community cat rather than being desexed, and rehomed.

5 Cat management

“The current options are:

- *Directly reducing cat numbers by*
 - *Excluding or eradicating cats from islands and purpose-built fenced areas on the mainland.*
 - *Poison-baiting (deployed from the ground or air).*
 - *Trapping, hunting, and shooting.*
- *Indirectly reducing cat numbers or impacts by:*
 - *Reducing introduced rabbit and rodent populations.*
 - *Allowing dingo populations to persist or re-establish.*
 - *Managing fire and grazing to maintain a complex ground vegetation layer (to reduce cat hunting success).*

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Pet cats are managed through responsible pet ownership practices, including containing the cat to the owner's property, identification, registering and desexing. However, these pet ownership practices are difficult to accomplish in remote, rural, and regional areas, for example where access to veterinary services is limited or absent.

Animal Care Australia categorically OPPOSES baiting deployed by air – particularly in areas of national parks, forestry, etc that have residential zones within a close proximity.

Councils, national parks management etc all state the responsibility of ensuring secondary poisoning and or domestic animal poisoning sits with the local landowners and residents simply because they place a Notice on a fence, gate or in the local newspaper. This is absurd. Many locals do not read their local papers on a regular basis or patrol the perimeter of the parks etc specifically looking for signage.

Air-delivered poisons DO NOT remain within the confines of the areas in which they are dropped. There are now far too many documented cases of baits (baited meat in particular) being transported by birds, particularly of the Corvidae family, multiple kilometres from the drop-zone. Far too many domestic pets are falling victim to random meat bombs landing in their backyards.

Greater legislative change is required to hold the distributors of these baits more accountable.

Additionally, the recent use of species-specific release mechanisms such as the Felixor by Thylation is one step in the right direction and a greater emphasis needs to be placed on ensuring different chemicals within the gels and baits are utilised, rather than 1080 (the chemically produced form of Sodium fluoracetate) and PAPP. The introduction of AI to identify the species prior to the bait being ejected or accessed is another great step in the right direction and will reduce more inadvertent poisoning.

While Animal Care Australia recognises these are currently the preferred poisoning methods to be used, neither of these meet the community expectation or values any longer, and the use of 1080 is also be opposed by a greater number of current scientific based studies. The government's reliance on PestSmart as its guiding source of justification for their continued use is also questionable.

Baits containing PAPP appear to be more humane than 1080 as the toxin acts faster and appears to be less aversive. While it is true that sodium fluoracetate is a naturally occurring, toxin found in more than 30 species of native Australian plants, the chemical compound utilised in 1080 is neither the natural form nor no longer considered safe to use around native animals on the eastern coast of Australia where it is NOT in a natural form. Prescribed dosage rate recommendations by PestSmart have also been proven to be incorrect and exaggerated in order to ensure the product has a successful kill rate.

Animal Care Australia joins the chorus of other organisations and scientists that do not support the use of 1080 as a current control method when greater technological advances can be made. Animal Care Australia supports returning to (and maintaining) more traditional methods of ground trapping (spring-based cages and not toothed or clawed appliances) accompanied by triggered notifications

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that a trap is now occupied for checking as well as ground shooting by authorised and trained hunters.

Animal Care Australia also recommends greater focus (including legislation) is required to guarantee better coordination across the geographic locations, agencies/organisations, and jurisdictions. A legislated requirement of public notification of ALL methods being used in any area is a necessity, and this can be completed via SMS messaging and in remote areas postal and local establishment/general store notifications. Not only will these make the residents more aware, but it will also increase the public awareness of feral animal issues within any geographical area.

5.1 Public support for cat management

Animal Care Australia supports all of the points and concerns raised in this section.

Animal Care Australia strongly recommends greater funding for public education on responsible pet ownership, appropriate cat containment measures and the impacts of free roaming on the cats' welfare as well as wildlife is the best for of response.

6. Guiding principles for plan development and implementation

1. Stakeholder groups with interests in cat management and welfare should be respectfully engaged

Animal Care Australia and other cat keeping organisation must be engaged for greater inclusion.

3. Programs to reduce cat impacts should use actions that are justified by optimising biodiversity outcomes, overall humaneness, and the sustainability of the action(s)

... choice among the action options should be justified by seeking to optimise:

- *The overall humaneness of the action(s), to:*
 - *Individual cats.*
 - *Individuals from other, non-target species potentially affected by the control action.*

Animal welfare MUST be prioritised under this action – including the level of unjustified suffering for the target as well as the non-target species.

This requirement MUST remove the use of baiting/poisoning unless no other options are available due to location or inaccessibility of other methods of control.

4. Cat management should occur within an evidence-based and adaptive management framework, where monitoring leads to continual improvements in knowledge and refinement of management actions.

- *Cat control programs should be designed based on the best evidence available at the time.*

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- *The effectiveness of cat management should be rigorously monitored, with such monitoring information made publicly available and used to refine ongoing management.*

These two points should be legislated requirements in order to ensure all agencies can be held accountable and transparent.

Additionally, local Advisory Committees should be established in order to provide a greater public investment in the control of feral cats as well as protection of local wildlife. Note: These should NOT be established in the same manner as the NSW Wild Dog Advisory Council in the Western Division which is made up solely of livestock representation. A proper Advisory Council must include a cross-section of stakeholders, representing local cat ownership, local wildlife and environmental groups and local Council representation.

8 Objectives, performance criteria and actions

Table 3: Objective 1

1.2 under Objection 1: Allowing individual councils to set cat free suburbs

This is discriminatory to cat owners and puts cats who might wander into a “cat free suburb” at greater risk as animals do not understand an invisible boundary

There are many people who have an extreme dislike for cats currently and this suggestion creates segregation amongst communities.

Animal Care Australia strongly opposes this Action

1.3 Local governments improve regulatory and policy settings to reduce pet cat impacts [see also objective 9 for management actions]:

- Where there are gaps in state/territory legislation, by introducing bylaws to require responsible pet cat ownership (registration, identification, desexing, household caps, containment)

Animal Care Australia strongly opposes providing Local Councils with greater powers – particularly in placing household limits on pet ownership.

Animal Care Australia does not support limits or number restrictions on pet ownership. Victoria's Domestic Animals Act has placed the responsibility of enforcement onto Local Councils and this has resulted in extreme abuse of powers, and irrational and irresponsible animal restrictions imposed.

Table 5 Objective 2. Plan cat management within an evidence-based framework, with broad stakeholder and community support

2.7 Maintain the national Feral Cat Taskforce as a primary mechanism to help coordinate the management of feral cats across jurisdictions.

Animal Care Australia strongly recommends the inclusion of representation of pet cat keeping organisations on this Taskforce.

Animal Care Australia welcomes the opportunity to provide that inclusion and consultation.

2.8 Create a 'practitioner resources and network', or regional networks, for Indigenous groups, community groups, and individual landholders, to make information about impacts, research, monitoring, and management accessible, and to help managers make connections with other practitioners. The network would help practitioners to:

- Share practical knowledge about cat control options
- Learn about processes for obtaining permits and training
- Find guidance for choosing control options and monitoring options
- Suggest avenues for accessing scientific support
- Make connections with other land managers
- Share approaches for enhancing community support and engagement in pet and feral cat management

Animal Care Australia strongly recommends the inclusion of representation of pet cat keeping organisations within this Network.

Animal Care Australia welcomes the opportunity to provide that inclusion and consultation.

2.11 Maintain, enhance, and update as required Codes of Practice (CoPs) and Standard Operating Procedures (SoPs), coordinated across jurisdictions, assessed using the humaneness index, and presented in a variety of formats to maximise accessibility to diverse stakeholder groups

Animal Care Australia supports this Action, with the caveat that all stakeholders and affected community groups must be consulted during any review, development, or implementation.

2.15 Engage and communicate with the broader public.

- Disseminate information on cat management issues and biodiversity outcomes of cat management via regular and social media, with content and format tailored for different stakeholder groups.
- Make available information on the multiple benefits of habitat, pest animal, and dingo management (for regions where the benefits are known), in accessible formats, to diverse land manager groups.
- Develop engaging materials illustrating the impacts of cats on Australian fauna, and management options, as teaching resource packs for use in school education programs.
- Undertake research to understand whether engagement is changing attitudes and behaviours.

2.16 Maintain and increase broad public support for improved cat management for conservation, cat welfare, human health, and livestock production outcomes.

- Understand the level of public acceptance for different control options for feral cats in natural environments (including poison-baiting, shooting, etc), and what might change those views.
- Understand the complexities in how Indigenous communities may view feral cats, and their place in Country, and as pets, and how best to discuss cat management

Animal Care Australia supports both Actions, with the caveat that all reports and research results are publicly released for stakeholder feedback

8.4 Objective 4. Refine the use of existing tools, and develop new tools, for directly controlling feral cats, and make the tools appropriately accessible

Ongoing community concern over the use of toxins, particularly 1080 is growing and the actions and reporting criteria within this Objective are vital to ensure transparency and accountability of the programs being undertaken.

Animal Care Australia supports ALL Actions within this Objective, with the caveat that all reports and research results are publicly released for stakeholder feedback.

Animal Care Australia welcomes and supports the inclusion of the following with the Threat Abatement Plan and we hope this is a requirement that all states and territories must adopt.

- ✓ Toxic baits (Eradicat, Curiosity, Hisstory) and alternative toxin presentations (e.g., Felixer) are registered and available for use in those parts of Australia where their use is justified based on the biodiversity benefit, overall humaneness, and sustainability.
- ✓ The biodiversity benefits, and attendant risks, of shooting, trapping, and tracking for controlling cats, in different contexts, are better quantified.
- ✓ The use of guardian dogs to repel cats from sites supporting populations of cat-susceptible species has been trialed and evaluated.
- ✓ The potential to develop synthetic biology (e.g. immunocontraception, gene drives) to reduce populations of cats is explored.
- ✓ Improved understanding of the extent to which cat recognition and avoidance by native prey species can be encouraged via managed selection.

Objective 4. Refine the use of existing tools for directly controlling feral cats, and develop new tools Priority Cost Responsibility Timelines

- ✓ Improve understanding of broad-scale environmental impacts of the two toxins used for cats, 1080 and PAPP (Para-aminopropiophenone).
- ✓ Continue trials of toxic implants (in prey) and toxic collars (for prey and for sentinel cats) and determine when these approaches are most effective.
- ✓ Refine formulations to produce longer-lasting baits.

Animal Care Australia would like to see other 'guardian animals' such as donkey and alpaca included in the TAP.

The refinement of formulations MUST be explored in order to reduce the current secondary poisoning risks INCLUDING the development of baits that have a vaccine or reversing agent that can be provided to veterinarians and other relevant organisations in order to protect domestic pets and accidental poisoning of native wildlife.

Table 17: Objectives & Actions

8.1 Manage rabbits and introduced rodents to reduce cat populations and impacts

While Animal Care Australia supports this Action, we IMPLOR the Federal Government to take a greater responsibility in ensuring suitable vaccines are available PRIOR to the release of any biological control methods of rabbits and mice. Domestic (pet) rabbits and mice are too susceptible to these forms of control and are continually subjected to inhumane and unnecessary suffering due to the ongoing failure of state and local governments to adequately inform residents of biological use, and the unavailability of effective vaccines through veterinary practitioners.

8.5 Mesopredator control by dingoes: Carry out research to evaluate how dingo management could affect feral cat abundance and impacts and the consequences of such effects on threatened species and ecosystem resilience, and then develop costed options for landholders at regional scale

Animal Care Australia implores the Federal Government to legislate a nation-wide definition of a Wild Dog that DOES NOT include the dingo (or claimed hybrids).

Current research continues to show the level of hybrids is minimal and this disinformation and misidentification has been perpetrated by the livestock and farming industries. This MUST be changed.

8.9 Objective 9. Reduce density of free-roaming cats around areas of human habitation and infrastructure

Animal Care Australia supports ALL Actions within this Objective, with the listed feedback below:

Animal Care Australia supports 24/7 containment policies BUT NOT 'pet cat prohibited zones'. Any prohibition MUST be accompanied by provisions that ensure any cat found roaming within these

zones IS NOT automatically killed/euthanised. Cats DO NOT understand or follow invisible boundaries. While Animal Care Australia acknowledges the responsibility for free-roaming cats must lie with the owner, circumstances do exist where the owner may be unaware of them at having been let out of containment enclosures etc. Owners and cats must be provided with the opportunity to be reunited. Having said that, Animal Care Australia could support a three-strikes system that provides for Local Government to fine owners that reside within or nearby containment-based zones who do not keep their cats contained.

Objective 9. Reduce cat impacts around areas of human habitation and infrastructure

Animal Care Australia supports ALL Actions within this Objective, with the listed feedback below:

Again, **we do not support 'cat free suburbs'**.

Coordination of education programs should also include local and state-based cat keeping associations. Local and State Governments MUST include these associations at all levels of consultation, promotion, and implementation.

As a general response to the Actions within Objective 9 Animal Care Australia makes the following recommendations:

- Provide a clearer pathway through local government for approval of secure cat containment on their properties (enclosures)
- Investments in research and studies on TNR programs to obtain the data required about impacts.
- Consult with conservation experts to look at large scale fencing to create predator free zones
- Governments must invest in Improved education regarding responsible pet ownership and cat containment which keeps the cat safe as well as mitigating the opportunities for the cat to become a pest.
- Develop ongoing strategies in all areas to assist people to be able to fund the desexing of their animals.

Subsidised desexing for locations with high populations of stray/feral/colony cat will assist in reducing the number of cats that are able to reproduce which will have an ongoing impact on the number of cats in certain locations.

Draft Updated Threat Abatement Plan for predation by feral cats



- States requires that all cats and dogs must be microchipped by 12 weeks of age or before being sold/given away, but the exact rules around keeping cats varies across councils. Cats are allowed to roam, and some Acts do not require a council to collect or accept cats into their animal care facility.
- Strategies are required from those collecting the 'data' to identify where the cats are coming from so that targeted education can be developed. The owner who lets their cat out in their backyard for a few hours per day in a secure environment is not the same as the owner who has cats that are not desexed living outside with minimal food.
- Data is also required on the breakdown of cats being euthanised as not all cats in the 'feral' category fall into the definition. Cats who are scared will show similar signs to an unsocialised cat.
- A clear distinction needs to be made about the treatment of the 3 main categories of cats as they are not the same – pet cats, stray cats, and feral cats.
 - Pet Cats: These are cats that are owned by a person/people who have their needs wholly or partially fulfilled by their owners (food, shelter, veterinary care etc), but may live indoors or outdoors. Whilst they may hunt, this is not generally seen as a means of survival, but more using their natural prey drive to exercise.
 - Stray Cats: These are cats that are most likely to have been a pet cat at some point and socialised with people. The longer these types of cats remain as strays increases the potential for them to fall into the feral category as their contact with humans decreases.
 - Feral Cats: These are cats that are not formally owned or cared for by people. They survive by hunting for themselves and living in a variety of habitats (urban, rural and bushland). These are actively hunting for food to survive and the most dangerous of the cat categories as an invasive species.
 - Stray/Feral cats have long divided the community with opposing views on the solution. Without data on how many cats fall into the stray and feral categories and the locations, the solution becomes challenging.
- The recent NSW Companion Animals Amendment (Rehoming Animals) Bill 2021 ensures that councils take certain steps towards rehoming seized or surrendered animals before euthanasia. This legislation is good news for those cats that find themselves in the "pound" system with councils but does not afford any protection for those cats deemed as 'feral' or have behaviours. This MUST be addressed – not just in NSW – but nationally.
- Many people keep the locations of cat colonies secret due to the fear that the cats will be trapped and euthanised, as well as fear for the safety of the colony and negative public sentiment. The secret and transient nature of cat colonies does not promote good welfare

outcomes as the cats are unknown and unidentified and have no access to veterinary care if required.

Animal Care Australia STRONGLY SUPPORTS a One Health approach by all parties invested in the implementation of the Threat Abatement Plan.

Animal Care Australia welcomes any questions you may have as you continue to finalise this Plan.

This submission can be publicly listed.

On behalf of the Animal Care Australia Committee,



Michael Donnelly
President
Animal Care Australia