

Victorian Cat Management Strategy



Animal Care Australia submission

Approved: 26th April 2024

“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.

Opening 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.

Animal Care Australia supports the protection of native flora and fauna above that of introduced species. However, Animal Care Australia does not believe that convenience or economics should ever be prioritised above good animal welfare outcomes, even when dispatching pest species.

Animal Care Australia supports the removal of feral cats from the environment, however with strategies that maintain humane methods of removal but not at the expense of barn cats (cats on farms) who are required to more generally free-roam or the misidentification of 'frightened' owned cats that may have a non-functioning or missing microchip.

Animal Care Australia continues to support initiatives that are designed to educate the public on responsible pet ownership. Therefore, Animal Care Australia supports the Vision and Objectives of this Cat Management Strategy (CMS).

Vision: "Cats are cared for by responsible owners, ensuring the wellbeing of cats, wildlife and the community".

Objectives:

1. Promote cat welfare and responsible ownership.
2. Protect the environment and community from the negative impacts of cats.
3. Improve processes, cooperation and knowledge sharing in cat management.

Animal Care Australia supports the 7 Themes designed to meet the objectives and we commend Animal Welfare Victoria for its efforts in this document. It sounds wonderful in theory, however, it appears the authors of this strategy are completely unaware of the multitude of legislative barriers to responsible animal ownership that Animal Welfare Victoria, previous Ministers for Agriculture, and the Victorian Government have implemented that currently make owning animals, including cats, as difficult and expensive as possible. It can be logically argued these barriers are exacerbating the issues with cats in Victoria.

Over the last eight years, or so, the heavy influence of Animal Rights Extremists, pulling strings in parliament, and outside of it, resulting in red tape and unnecessary fees, providing Councils with the power to completely eradicate pet breeding, and place cumbersome and unjustifiable burdens on pet owners, has had the desired effect of owning animals, including cats, as difficult and expensive as possible. The largest issue with this outcome is the burgeoning of non-compliant hoarding and underground pet breeding. The Victorian Government, Animal Welfare Victoria and the animal rights influencers are predominantly responsible for this outcome.

The Cat Management Strategy feels like yet another layer of legislation to make pet ownership in Victoria as unattainable as possible.

Restricting pet ownership is not the same thing as Responsible pet ownership.

A critical outcome that is necessary for this Cat Management Strategy to even remotely function as described is to make pet ownership in Victoria easier. Accordingly, we provide the following feedback on the Strategy.

Feedback on the Strategy

Cat Management:

Page 6: The description of Councils includes:

*“Councils can tailor domestic animal services to the needs of their community by setting registration **fees**, as well as through Domestic Animal Management Plans (DAMPs), and introducing local laws on cat containment, desexing **and pet limits**.”*

Proving our Opening Statement. Councils should not have this level of autonomy and power. It has created entire municipalities where pet ownership is extensively restricted and others where pet ownership is still possible.

Councils create pet limits based on the Planning Law Provisions restricting owners to between 2 ANIMALS and 5 ANIMALS without then applying ludicrous levies, DA application process, land use changes and finally refusal to approve excess animal permits without all of the above being met by owners simply wanting to own more than two animals. **NOTE:** We say animals here not cats. Prior to 2019 the Planning Provisions separated domestic animals from livestock – this no longer occurs.

“Council authorised officers have powers to enter properties, seize animals, issue fines and prosecute matters in court.”

This is the Victorian Government wiping its hands of the responsibility of ensuring appropriate compliance of it’s own legislation. As proven by the overwhelming number of Councils placed under administration in the last 8 years (almost all of them) Councils are rife with complaints of abuse of power, corrupt behaviour and so on – and yet the Government continues to place the responsibility of compliance and implementation of the welfare of our animals in their control? This is astonishing!

The RSPCA is described as an Animal Welfare Organisation! While their websites might make that claim, their policies and actions create a very different outcome. The social license and acceptance of the RSPCA as being for the improvement of animal’s lives is drastically swerving away from this organisation.

The term ‘Cat Welfare’ as it is used in the Cat Management Strategy appears to be used to describe the shelter and pound industry and not the welfare outcomes of cats – all cats – feral, owned, semi owned or unowned. Cat Welfare is equally important to them all, not just those who arrive in shelters and pounds. We are perplexed by the ‘blinkerred’ misuse of such a crucial term, though following comments from staff employed by Animal Welfare Victoria during consultation processes, this is not surprising to us.

“Animal welfare” is being systematically removed from all animal welfare legislation in Victoria and replaced with Animal Rights (aka Animal Protection) – ‘Adopt Don’t Shop’ mottos are being perpetrated as ‘caring for animals’ rather than the government and activists focusing on promoting responsible pet ownership. Ironically IF responsible pet ownership did become the focus of their efforts that would result in a reduction of the number of animals requiring adoption or rescuing. The government and particularly Local Councils need to give that serious thought. Clearly restrictions of the last 8 (plus) years are not working.

Cat overpopulation

There are approximately 227,000 cats registered with Victoria’s 79 councils, with 6.929 million people living in Victoria. There are approximately 4.35 million adults in Victoria. According to AWV’s own

recent (2023) pet census 24% of all adults own a cat. Using those figures that means there are approximately 1 million owned cats in Victoria. That implies two very different pictures:

1. There actually is not an over-population problem OR
2. Councils' insistence on restrictions and fees is resulting in a huge non-compliance problem. This is clearly the issue that needs to be addressed.

Incentives for people to register their cats are clearly lacking. The potential increase of registrations with the right incentives would automatically see an increase in cats microchipped and desexed.

The Strategy correctly identifies that a lack of desexing is a driving reason for an increase in cat populations and clearly a greater investment is required to incentivise and improve desexing rates in Victoria.

Registered cat breeders (with AO's) are required to desex their kittens before sale – with the exception of selling to another breeder – therefore it is paramount that cat owners who have obtained their pets from non-registered breeders are educated on the needs to register, desex, microchip and only purchase from responsible breeders.

Education (pg 7)

“pre-pubertal desexing (by 4 months),” is not supported by Animal Care Australia as this is not prioritising a cat's wellbeing. Its dishonest to state that there are not detrimental effects on a cat's long-term health from early desexing, and if this is enforced, it must be presented honestly – as a necessary evil for unowned and semi owned cats, as there is no benefit to the individual cat. See Appendix 1 for more information.

Owners should have the choice to prioritise their cats' long-term health and welfare, without being penalised for it. Responsible pet ownership is about doing what is right for your animals, even if its inconvenient for you, and that responsibility includes keeping cats secure at home until they are mature enough to be safely desexed. Educated and responsible owners take this obligation seriously. It is through education that this responsibility is learned.

Collaboration and information sharing

“the strategy aims to improve collaboration, coordination, and information sharing to make cat management more effective and to facilitate the broader dissemination of key information and best practices across the cat management landscape”

Animal Care Australia and other cat keeping organisations must be engaged for greater inclusion and dissemination of information. Councils must be required to engage with their local cat keeping organisations and/or national organisations. They also must be required to respond to feedback appropriately. In Victoria, Animal Care Australia sees a lot of consultation that goes completely ignored - reacting appropriately to the consultation with stakeholders is a key step.

Laws and process

“There are opportunities for the strategy to improve laws and processes that will improve outcomes associated with domestic cat containment, desexing, registration, rehoming and feral cat management.”

While Animal Care Australia welcomes the opportunity to review laws and processes it is vital to remind everyone that ‘restrictive pet ownership is NOT responsible pet ownership’.

Processes that incentivise compliance and education will be more attractive and more successful than the current failing legislation and processes.

Guiding Principles (pg9)

Animal Care Australia agrees with and supports the section on **‘Cats deserve caring owners.’**

‘Empowering’ communities’: While this section reads all ‘cute & fluffy,’ it doesn’t explain how communities will be empowered? The only description is of how government will dictate and enforce yet more animal ownership laws through the Cat Management Strategy and will expect communities to comply. How is this empowering anyone? How is this responding to the points already highlighted previously in the Strategy that the existing processes and laws are failing? Dictating and enforcing WILL NOT empower the community, it will isolate them.

‘Embracing diverse perspectives’:

Animal Care Australia fully supports the following statement:

“Rather than demonizing cats or their owners, it is crucial to approach cat management issues with understanding and compassion.”

Animal Care Australia supports the need for evidence-based solutions in this statement:

“Collecting data is essential to ensure decisions and solutions are evidence-based and human-centered.”

However, where is cat welfare considered here? It is concerning for us when we consider WHO is providing this so-called ‘evidence.’ It is one thing to respect diverse opinions, but not all perspectives are valid, and many should NOT be embraced at all. A department with the majority of staff who own rescue cats is certainly NOT the evidence base one should be approaching when developing cat over-population solutions. They would be particularly biased against cat breeding.

At the end of the day, cat welfare, and their species-specific needs are what need to be prioritised in a Cat Management Strategy.

Owners need to be educated on how to meet and exceed the species-specific needs of their pets in the human environment to ensure their cats’ good health and a long happy life.

‘*Human-centric decisions*’ lead to anthropomorphising and unrealistic expectations of cat behaviour. This is the opposite of education. This is how we end up with unrealistic, and cat unfriendly laws such as the current pet limits.

‘Progress over perfection: ‘

This is FULLY SUPPORTED by Animal Care Australia.

This is how Animal Welfare standards have improved over the years. Restrictive laws that punish good owners is a backwards step. Education and changing community expectations takes time, and investment in the community can speed up these improvements. Over-regulation DOES NOT.

Key partners and stakeholders

Animal Care Australia represents a number of stakeholders listed within the tables on pages 11 and 12 and accordingly we welcome the opportunity to continue to be consulted throughout the development and beyond the implementation of this Strategy.

Themes and actions summary (pg 13-14):

1. Promote cat welfare and cat ownership:

There are already too many laws and regulations that cat owners are completely unaware of. There has been no community education of the statewide limit of 2 cats per household, leaving it up to

Local Councils. Despite having cat owners registered with councils, we are not aware of ANY councils contacting pet owners to advise them explicitly of changes to pet limits, without any grandfather clauses. This has set up many owners for failure and resulting in councils demanding euthanising of pets. Even if a resident was conscious there may be local laws – Council websites do not make it easy to find those laws without knowing the exact title of the local law in question.

New laws must NOT set up pet owners for failure or prosecution, when laws are nearly impossible to find, and no effort has been made by lawmakers to educate the community on how new laws affect them.

2. Increase cat desexing rates:

Again, Animal Care Australia does not support pre-pubertal desexing initiatives for owned cats. This is a necessary evil for unowned and semi owned cats only. Owners should not be misled into believing these procedures on infant animals are harmless.

3. Expand Cat Containment:

Point 6: Councils do not require support to implement cat containment. Funding needs to be made available for residents to install necessary cat containment when laws make containment compulsory. Particularly for low income, or disadvantaged community members. It is not Councils that need support – it is cat owners!

Point 7: Animal Care Australia supports this point. We remind you that cat containment MUST be on one's property and NOT within one's home or solely restricted to an enclosure.

Point 8: Animal Care Australia supports this point, but at a low-cost or subsidised cost.

4. Reduce the impacts of semi-owned or unowned cats:

Point 9: This entire point is currently not possible, as statewide laws limit animal ownership via Planning Provisions to either 2 or 5 animals depending on the size of the property, While Councils limit ownership to just 2 cats without permits, DA's, or land use changes.

This discourages microchipping and council registration, as people do not want their animals seized due to having too many. Animal Care Australia has not seen evidence of Councils granting permits for additional animals, instead demanding that animals that cannot be rehomed are euthanised. This is unreasonable and serious overreach of council powers.

All of that needs to be amended before anyone would openly consider taking on the responsibility of a semi-owned cat. Encourage people to take responsibility and ownership of the animals they care for by making it EASY for them to do so. Waive registration fees, provide free desexing, and remove

pet limits from the state. People who HAVE the time and means to care for more animals, should be encouraged to do so without cumbersome red tape and jumping through rings of fire (i.e., abusive, belligerent Council staff)

Point 10: Unidentified cats need MORE time to be found by their rightful owners – not LESS! Cats have a low reclaiming rate as it is. This proposal makes it even harder. It is incorrect to assume that a cat with no ID has no owner. It would be better to waive reclaim fees and provide free microchipping and desexing to those cats to ensure they are reclaimed.

Cats on the whole react poorly to being enclosed and by reducing holding times for these cats you are also likely to be trying to rehome a mis-behaving cat OR worse that misbehaviour is deemed to be that of a feral cat and the cat euthanised. This leads into Animal Care Australia's support for point 11.

This is how cat centric, and not human centric decisions can be made for the benefit of everyone, including council.

Point 11: This point is supported but needs to go along with training for those assessors. The assessment process needs competent assessors to be effective and not just Council pound or shelter workers.

Point 12: Animal Care Australia notes the difference stated here: Capture, Desex and Adopt. Animal Care Australia fully support this. Operators of this MUST be conscious and prepared for the sudden removal of colonies and may encourage other cats to move into the vacated area and re-establish a colony. Considered and continual programs must be adopted and adhered to in order to be effective.

Point 13: Animal Care Australia supports this point but this needs to be tied in with cat containment, allowing Victorians to own more animals, and educating owners on responsible animal ownership. The current pet limits are severe and un-realistic. They encourage people to hide their animals. Fear of being caught places the animals' welfare at risk. People should not be forced into this position. When animals are not being hidden, their welfare is being monitored by the community. Government and councils should NEVER have laws that could discourage anyone from seeking veterinary or husbandry help for their animals.

5. Manage Feral Cat populations and impacts

Point 14: This needs to reliably identify feral cats and separate them from owned/semi/unowned cats prior to any implementation of controls as these will vary accordingly.

Point 16: While supported, Animal Care Australia wishes to highlight, in NSW there was a case of traditional landowners hunting cats as a food source, and when the cats were poisoned, so were the people. This cannot ever happen again.

Points 14 through 17:

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 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.

6. Improve collaboration and information sharing:

Point 18: While supported, public awareness of these key stakeholders is essential AND cat owners/breeder associations including Animal Care Australia MUST be included in order to provide balanced references for knowledge. The voice of RSPCA DOES NOT represent the needs or the knowledge of cat ownership.

Point 19: While Animal Care Australia agrees in theory – some centralised systems (reliant on Council input) do not operate in real time and have long delays for data to be entered. Data that is not up to date is useless and cannot be relied upon. Until the systems are first improved to a functional standard, we cannot support this recommendation.

Point 21: Supported, and the summaries must include statistics of animals known to council as well as seizures and unidentified animals, as well as reporting animal fate data.

7. Improve Laws and processes

Point 22: Without serious legislative overhauls to reintroduce animal welfare as a guiding principle of the Cat Management Strategy, this strategy is set to fail. So how will that failure be monitored? Animal Care Australia would suggest that increased numbers of owned cats being registered in households across all councils would be a measure of success, but this is simply not legal in Victoria with the severely restrictive pet limits. It appears that the Strategy will focus on the disappearance of cats to measure its success. There does not appear to be any other options under the current proposal.

Without identifying what will be considered as a failure how will you identify what needs to be reviewed in order to identify further options for reform including funding models?

Point 23: Again - Early desexing should not be encouraged for owned cats.

Point 24: Supported by Animal Care Australia – most importantly reviewing from an intent to incentivise rather than being restrictive or terrorise animal owners.

Recap: Recapping and highlighting our priorities:

- Current statewide pet limits (enforced by Councils and the Planning Provisions) should be lifted to encourage more households with the time and means to own more animals to do so. This would reduce the burden on shelters and pounds.
- Changes to pet keeping laws must be highlighted to pet owners.
- Laws need to be simplified to be reasonable without over regulation so that owners can understand their responsibilities.
- Rescues and shelters – including the RSPCA – need to be regulated and have greater accountability and oversight.
- Education programs in schools on responsible pet ownership need to begin in primary school. This is the easiest way to educate migrant families on Australian community expectations
- Prepubertal desexing (PD) is NOT supported for the reasons outlined in our attached Annexure 1¹ ²
- Animal Care Australia strongly recommends and supports engaging and communicating with the broader public in order to:
 - 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.

¹ [Desex QLD](#)

² [Vets and PD](#)

- 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.
- To assist in rehoming the Government needs to recognise that cats are a social species that usually pair-bond with another cat for life. Ideally, cats should not be kept alone without company. Educating potential cat owners that they should - to meet the cat's mental and social wellbeing - buy 2 cats or kittens, not just one, will double rehoming rates per new cat owner.

Cats that are have lived alone for some time can have difficulty adjusting to a new "intruder" in the house, but new adoptions (desexed) should be encouraged to be in pairs or more.

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

Annexure I: Prepubertal desexing

“The practice of prepubertal desexing (PD) and early age desexing (EAD) of dogs and cats has been utilised in animal shelters since the 1980s as a tool to combat overpopulation.”

While the unowned cat population may be addressed in time and with more resources, it comes with welfare issues for individual animals that are subjected to early desexing. When it is not your cat, it is easy to say that the greater good to reduce the population is more important than your individual cat’s future health.

Desexing dogs and cats too young can lead to health issues later in life and has been documented in Australia, as well as internationally. While most research in this area has focused on dogs, particularly large breed dogs, research on the long-term impacts for cats has been published in recent years. Animal Care Australia is aware of research currently underway looking into the effects of early desexing on large breed cats, following several reports of unexplained low bone density leading to premature fractures that do not occur in the cat’s related breeding populations. This was examined to rule out a genetic cause for the fractures.

While private practice veterinarians recognise the risks of surgery and potential long term health impacts, most will desex only after 6 months of age – for the sake of the patient. While pounds and shelters advocate for desexing as early as possible – even as young as 6 weeks of age – as a population control measure. The patient (the animal) is simply not the priority.

Australian Vets in QLD report that all of their client’s cats are desexed, while the opposite is reported by RSPCAQ - almost all surrendered cats are not desexed.

Clearly, the cats that are seen by veterinarians and the cats that the RSPCA see, are not the same population of cats. The same study noted that while vets are usually seeing the owner and carer of the cat, shelters are primarily receiving animals that are strays handed in by someone who is not the owner of the cat.

This suggests that pounds, shelters, and rehoming organisations have a skewed view on pet owners, and feel that owners are generally irresponsible, and therefore should not have a choice in when their pet is desexed. While the pet and vet industry has a very different perspective of pet ownership, with very high rates of desexing, even when done at a later age.

The compulsory, desex all cats early message is a flawed one, and should not be applied uniformly across all populations of cats, but focused on the actual problem populations, not responsible pet owners. The early desexing message should be more honest – that this is a necessary evil to solve a bigger problem, and not a harmless procedure that should be inflicted on an infant animal.

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A lack of education and allowing anti-cat sentiment to fester in the community is making matters worse and creating more division on how the issue should be addressed. Education on responsible cat ownership is definitely needed in the form of school education, community seminars, social media, information pamphlet drops, open days and Local Government organised events.

Cat desexing amnesty events could also be organised within LGA's more often with discount vouchers and other incentives to help pet owners understand the benefits of and be open to cat containment structures and practices. Animal Care Australia commends councils that are already running such programs at regular intervals.

All of the future strategies must be undertaken following the advice of qualified animal behaviourists and follow best practice as outlined by Animal Welfare Scientists – not unqualified persons and groups with opposing agendas.

Welfare MUST take precedence over cost, but the issue cannot be ignored.