Animal Care Australia
2025

10th October 2025
The Director
Live Import List and CITES Policy Section
Department of Climate Change, Energy, the Environment and Water
Email: exotic.species@dcceew.gov.au

Import of Bengal cat, a hybrid animal of a domestic cat (Felis catus) and an Asian leopard cat (Prionailurus bengalensis), for non-commercial household pet purposes

Animal Care Australia 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.

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, companion animals, animals used for educational or entertainment purposes or kept for conservation.

As a nationally recognised animal welfare organisation, **Animal Care Australia supports the ability of breeders to import species of pets** in order to maintain and strengthen genetic viability and the continuance of the breed.

Australia's current import/export legislation along with breeding restriction legislations aka 'Puppy-farming legislation' continues to contribute to the massive decline in numbers of a range of cat (and dog) breeds and just like our native species, the rapid extinction of Australian-based breeds is perpetrated primarily by outdated and fear-mongering Government policy.

It is Animal Care Australia's strongest recommendation that the proposal to allow the importation of Bengal Cats (F5 plus) is approved and not solely for desexed cats.

Please see our attached submission – which can be publicly listed.

Should you require further details please do not hesitate to reach out as we would be happy to meet with you, and further discuss this matter.

Kind regards,

Michael Donnelly
President
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president@animalcareaustralia.org.au

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.

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:

- advocating for stronger welfare outcomes
- advocating 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

Animal Care Australia submission

Animal Care Australia

Import of Bengal cat, a hybrid animal of a domestic cat (Felis catus) and an Asian leopard cat (Prionailurus bengalensis), for non-commercial household pet purposes

“Animal welfare is animal care”

Approved: 10th October 2025

Cover image: DCCEEW website

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This submission has been developed in consultation with a range of members of Animal Care Australia including the ACA Cat Advisory Group, ACA Veterinary Representative (Dr Tanya Soo Phillips, Veterinarian, BVSc) and our Member Cat Associations.

CONTENTS

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, insects and exhibited animals. Our Advisory Group members also work in the rescue, training, veterinary, care and rehabilitation sectors.

Opening statement

As a nationally recognised animal welfare organisation, Animal Care Australia supports the ability of breeders to import species of pets in order to maintain and strengthen genetic viability and the continuance of the breed.

Australia's current import/export legislation along with breeding restriction legislations aka 'Puppy-farming legislation' continues to contribute to the massive decline in numbers of a range of cat (and dog) breeds and just like our native species, the rapid extinction of Australian-based breeds is perpetrated primarily by outdated and fear-mongering Government policy.

Responses to the Consultation

Import of Bengal cat, a hybrid animal of a domestic cat (Felis catus) and an Asian leopard cat (Prionailurus bengalensis), for non-commercial household pet purposes

It is a misleading statement to classify the current day Bengal cat as a hybrid. Bengal cats these days are at least 5 generations away from the original matings which began in the 1940's and are considered worldwide to be a domestic cat.

The decision, announced on the 10th December 2024, by the Department of Climate Change, Energy, the Environment and Water (DCCEEW) to implement a ban on the importation of Bengals into Australia is reported to have been made on the basis that some cats imported into Australia were less than five (F5) generations removed from their wild ancestors which caused concern about potential risks to Australia's ecosystem and wildlife. [1]

There is no information accessible that supports that claim. Despite announcing there was a detailed policy review, the DCCEEW has not provided statistics showing how many Bengal cats actually entered into Australia who were less than five generations removed, or over what period of time or how DCCEEW identified that this had occurred. There is no Review title quoted on any of the announcements made by DCCEEW or by the Australian Department of Agriculture, Fisheries and Forestry (DAFF).

Animal Care Australia questions whether the possible reason for the lack of supporting data would identify the Department to be at fault for any such importation by approving those imports

[1] DCCEEW announcement for full ban

despite existing rules regarding the generational level a specific cat being imported must meet.

Following an extensive search, the only form of consultation Animal Care Australia could find related to changes to the importation of Bengal Cats was within submissions to the Federal Inquiry into the problem of feral & domestic cats in Australia, conducted by the Standing Committee on the Environment and Energy in August 2020.[2]

It appears DCCEEW has opted to take selective recommendations from those submissions to claim a consultation had occurred and to justify the policy change.

Among some of those submissions was a call for the importation of hybrid cats to be totally banned. Leading this charge was the **Invasive Species Council** [3] whose recommendations included:

> *"14. Maintain the ban on importation of hybrid cat species and apply it comprehensively, including to Bengal cats; otherwise, require that all imported Bengal cats are desexed."*

In recent media interviews Mr Jack Gough, CEO claimed: [4]

> *"One of the things about these Asian leopard cats is that they are very adapted to rainforest environments. So that means that they are better climbers, they are better hunters in more densely canopied bushland, and they are also better swimmers,"*

Even with this quote, Mr Gough is dramatically making incorrect statements and effectively contradicting his organisations own submission, in order to engage a fear-mongering response from the public. Firstly, the Bengals that are currently within Australia ARE NOT Asian Leopard Cats – they are domestic cats.

He continues stating the skills of the cat should one be in the wild, seemingly forgetting that his own organisations submission had recommended imported Bengals be desexed – desexed cats are still capable of perpetrating the same actions as any other domestic cat – in the wild or in the home.

Common knowledge and research into the Invasive Species Council will highlight they are emphatically opposed to the existence of cats in Australia without 24/7 containment. So, the mere idea of importing more cats is contradictory to their objectives.

At least the **Australian Veterinary Association (AVA)** recognised the need to have exemptions for the Bengal within their submission: [5]

> *"The AVA strongly supports the prohibition of the importation of high-risk domestic cat varieties and hybrids into Australia to prevent impacts on feral and domestic cats, on native wildlife and habitats. Further, the AVA strongly recommends that states consider prohibiting the possession of high-risk domestic cat species and hybrids. (Bengal cats will provide a legislative challenge and may need to be exempt)."*

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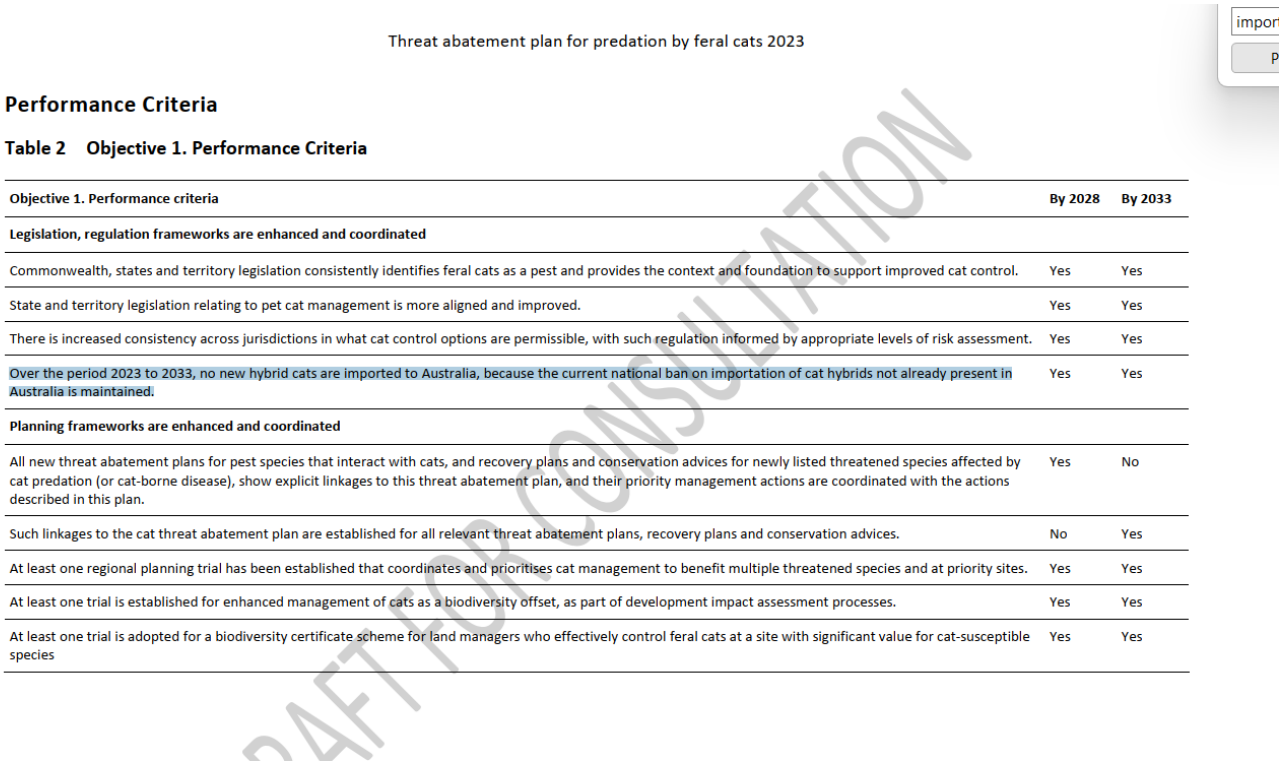
[2] Australian Parliamentary Inquiry into the problem with feral & domestic cats in Australia
[3] Invasive Species Council submission
[4] News article quoting Mr Jack Gough and quotes relating to Threat abatement Plan for Feral Cats
[5] AVA submission to Inquiry

Further evidence or questions must be raised as to the validity of the new ban when taking into consideration references quoted in the same news article to the release of the Threat Abatement Plan (TAP) for Feral Cats. [6]

> Table 2 (page 42) states:
>
> *"There is no exemption allowing the import of Bengal cats from 1 March 2025. From 1 March 2026, no hybrid cats are permitted to be imported into Australia without an environmental impact assessment and inclusion on the Live Import List."*

Oddly, this is a different statement to the same Table provided during the public consultation of the TAP which clearly states NO intention to include Bengals:

> *"Over the period 2023 to 2033, no new hybrid cats are imported to Australia, because the **current national ban on importation of cat hybrids not already present in Australia is maintained."***



Threat abatement plan for predation by feral cats 2023

Performance Criteria

Table 2 Objective 1. Performance Criteria

Objective 1. Performance criteria	By 2028	By 2033
Legislation, regulation frameworks are enhanced and coordinated		
Commonwealth, states and territory legislation consistently identifies feral cats as a pest and provides the context and foundation to support improved cat control.	Yes	Yes
State and territory legislation relating to pet cat management is more aligned and improved.	Yes	Yes
There is increased consistency across jurisdictions in what cat control options are permissible, with such regulation informed by appropriate levels of risk assessment.	Yes	Yes
Over the period 2023 to 2033, no new hybrid cats are imported to Australia, because the current national ban on importation of cat hybrids not already present in Australia is maintained.	Yes	Yes
Planning frameworks are enhanced and coordinated		
All new threat abatement plans for pest species that interact with cats, and recovery plans and conservation advices for newly listed threatened species affected by cat predation (or cat-borne disease), show explicit linkages to this threat abatement plan, and their priority management actions are coordinated with the actions described in this plan.	Yes	No
Such linkages to the cat threat abatement plan are established for all relevant threat abatement plans, recovery plans and conservation advices.	No	Yes
At least one regional planning trial has been established that coordinates and prioritises cat management to benefit multiple threatened species and at priority sites.	Yes	Yes
At least one trial is established for enhanced management of cats as a biodiversity offset, as part of development impact assessment processes.	Yes	Yes
At least one trial is adopted for a biodiversity certificate scheme for land managers who effectively control feral cats at a site with significant value for cat-susceptible species	Yes	Yes

This statement equally contradicts the (excuse) reason provided within the announcement of the new ban.

Table 3 of the consultation stated:

> *"1.5 Continue to disallow importation of **new domestic cat hybrids** that potentially threaten either a different suite of native species, or threaten some native species more*

[6] Threat Abatement Plan for Feral Cats

markedly than the current domestic cat."

Table 3 Objective 1. Actions

Objective 1. Coordinate and enhance legislative, regulatory and planning frameworks		Priority	Cost	Responsibility	Timelines
Legislation, regulation frameworks					
1.1	Enhance harmonisation across government legislation that identifies feral cats as a pest, requires feral cats to be controlled, and identifies control techniques that may be used, based on evidence of efficacy and risks.	Very High	Low	Commonwealth, state and territory governments	Starting immediately
1.2	Enhance consistency across state and territory legislation for companion animals, including mandating the principles of responsible pet ownership, and enabling local governments to more easily set additional bylaws that designate suburbs as cat-free.	High	Low	State and territory governments, local governments	Starting immediately
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). • By applying conditions of cat prohibition in suburbs near areas with high biodiversity value.	Very High	Medium	State and territory governments, local governments	Starting immediately
1.4	Harmonise relevant legislation or regulations across governments to prevent or reduce the likelihood of the introduction of cats to islands on which they are not currently present (linked to Actions 2.1 and 3.1; and Objective 5)	Very High	Low	Commonwealth, state and territory governments, local governments	Starting immediately
1.5	Continue to disallow importation of new domestic cat hybrids that potentially threaten either a different suite of native species, or threaten some native species more markedly than the current domestic cat.	Very High	Low	Commonwealth	Starting immediately
1.6	Ensure the potential consequences for impacts of cats are considered in development impact assessment processes, and that the potential benefits of cat control programs are considered in offset designs.	Medium	Low	Commonwealth	Starting in the period 2023-2028
1.7	Consider the potential of a 'biodiversity certificate' system for land managers who undertake cat control at sites of high biodiversity value. This aligns with Target 22 of the Threatened Species Action Plan (Community groups lead or participate in recovery activities for all accessible priority species and places, including through citizen science).	Medium	Low	Commonwealth, land-holders	Starting in the period 2023-2028

The Bengal is not a 'new' domestic hybrid. It already exists in Australia.

Suddenly Table 3 - 1.5 of the TAP appears to have been changed:

> *"1.5 Amend policy that allows import of Bengal cats so as to disallow further importation without an application being made to amend the Live Import List and the conduct of an assessment of the potential impacts on the environment.*
>
> *Ensure that any requests to amend the Live Import List to include hybrid cats are subject to an assessment of the potential impacts on the environment."*

Which is it?

There are '*cats that are less than 5 generations that have been imported into Australia*' or '*current national ban on importation of cat hybrids not already present in Australia is maintained'*

The statement is clear there was no intention to change the existing rules until at least 2033.

Equally both consultation tables clearly indicate there is no intention to change the existing restrictions, it clearly states 'cat hybrids ALREADY in Australia is to be maintained.

Animal Care Australia would like to take this opportunity to remind the DCCEEW of the following points:

1) The Government response to the recommendations from the Inquiry into the problem of feral & domestic cats in Australia did not include the need to review the existing

importation of the Bengal Cat.[7] Thus, the related entries in the consultation of the Threat Abatement Plan.

2) The *Environment Protection and Biodiversity Conservation Amendment (Reconsiderations) Act 2025 assented 27th March 2025* provides *'Decision not to be revoked in certain circumstances under Subsection 78(3) of the Environment Protection and Biodiversity Conservation Act 1999'*

(3A) The Minister must not revoke the first decision if:

(d) either:

(i) if the Minister is requested under subsection 78A (1) to reconsider the decision—at the time the request is made, the way in which the action is being taken has been ongoing or recurring for at least 5 years; or

(ii) otherwise—the way in which the action is being taken has been ongoing or recurring for at least 5 years.

The importation of F5 Bengal Cats has been permitted for the past 20 years in addition with the breed being accepted into the Australian Cat Federation [8] (ACF) in 1999.

3) The new ban and the sudden alteration in the Threat Abatement Plan WAS NOT part of that consultation/review. Had any such alterations been 'under consideration' it should have been appropriately highlighted.

Effects of the ban

The recent decision to ban the importation came with no consultation with cat registration bodies or breeders that this ban impacted. The breed was removed from the Live Import list on 10 December 2024 with breeders having a window until the end of February 2025 to secure a DCCEEW approval and with the cat having to be in Australia within 12 months.

Reputable breeders were left with very limited time to source the funds and a cat which met their requirements. Importation can be in excess of $10,000 for the cost of the cat, quarantine on both sides and flights. Locating and importing a cat is not an overnight process and can take months, if not years, and this ban has impacted the future of the breed within Australia.

History:

The modern-day Bengal was first created in the 1940's for the purposes of genetic and disease research with particular focus on the study of resistance of the feline leukemia virus (FeLV).

During the 1970's, the Asian Leopard cat was crossed with domesticated purebred cats such as the Egyptian Mau, Abyssinian and Burmese for the coat pattern and temperament.

In 1983, the Bengal was registered with The International Cat Association (TICA) as a specific breed.

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[7] Government response to recommendations from the Inquiry into problems with feral and domestic cats

[8] Australian Cat Federation and website

From the year 2000, Bengal cats have been classified at domestic cats.

Hybrid Generations:

The first recorded cat of the Asian Leopard cat hybrid experiment was bred by Jean Mill in America in the 1960's.

In an experimental breeding program, there are hybrid generations before they are become recognised as domesticated cats or a specific breed.

- F1 is the first mating (50% wild, 50% domestic)
- F1 cats are bred back to domestic cats to create further generations (F2, F3, F4 and future generations)
- F4 cats are considered domesticated
- F5 cats are considered fully domesticated in classification and temperament

Generation F4 or later Bengal cats today are classed as a fully domesticated by breeders and cat registries around the world such as TICA (The Internation Cat Association) as well as the Coordinating Cat Council of Australia (CCCA), Australian Cat Federation (ACF), and Australian National Cats (ANCATS) in Australia.

Bengal cats have a specific breed standard including patterns and colours with the cat registration bodies around the world which allows them to be shown in cat competitions.

The **"F" stands for "filial generation,"** meaning how many generations separate the cat from its wild ancestor.

- **F1** = 1 generation removed (one parent is an Asian leopard cat)
- **F2** = 2 generations removed
- **F3** = 3 generations removed
- **F4** = 4 generations removed
- **F5** = 5 generations removed

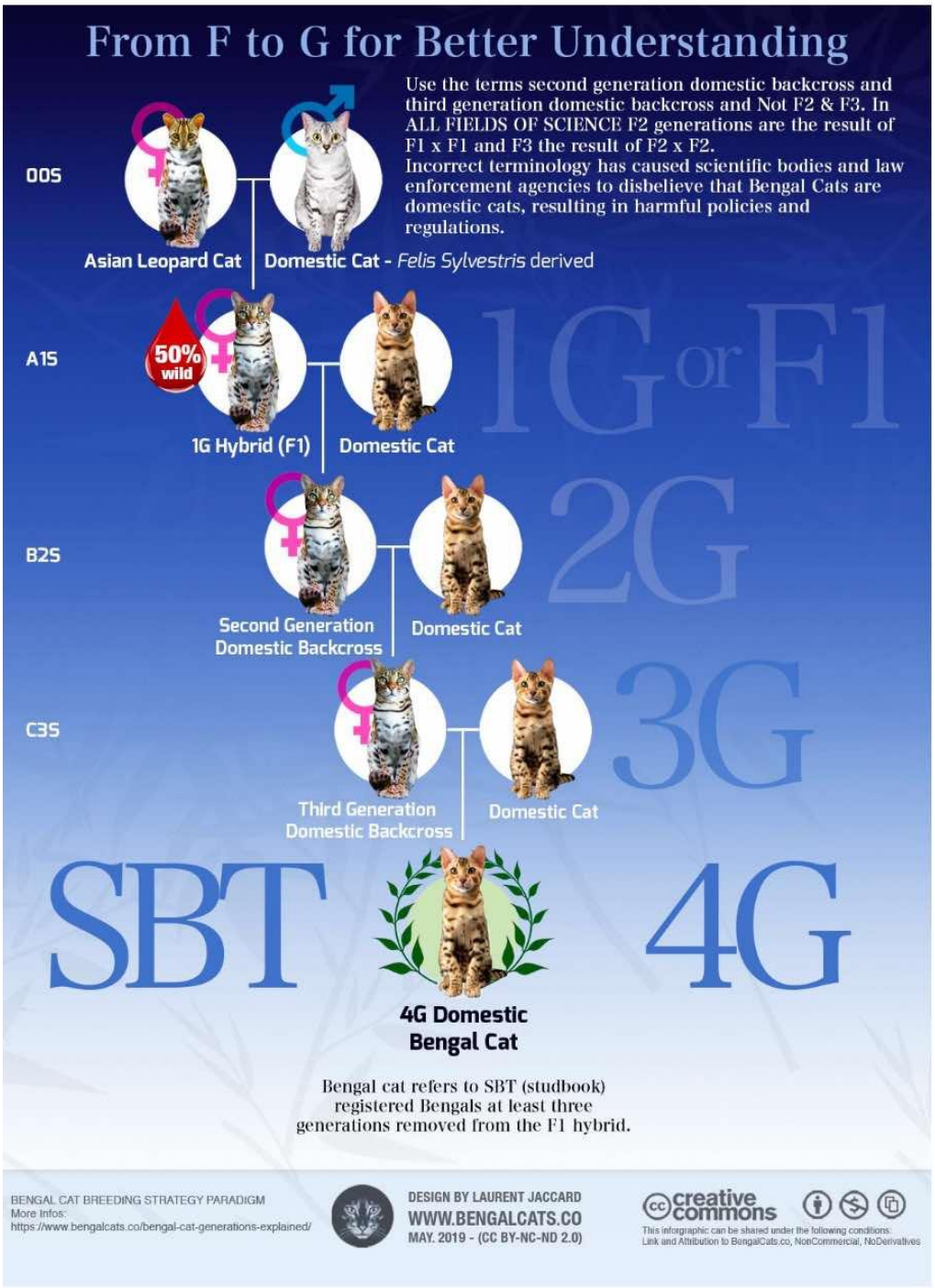
Domestic Status of Bengal Cats (SBT Classification)

From the fourth generation onward (F4), Bengal cats are officially classified as SBT (Stud Book Tradition) by the International Cat Association (TICA). This designation means the cat is the product of at least three consecutive generations of Bengal-to-Bengal matings, with no wild (Asian Leopard Cat) parentage remaining in recent lineage.

SBT Bengals are considered fully domestic cats (Felis catus) - genetically, behaviourally, and legally.

They are the only type of Bengal eligible for competition and registration as a purebred cat. Early hybrid generations (F1–F3) were typically bred solely for foundation purposes and are not kept or

sold as pets. Note: F Generations can also be known as G Generations, and the key is the number – F5 or G5 means 5 generations away from the original hybrid mating creating the F1 version.



This classification confirms that all Bengal cats available worldwide to the public and registered through recognised cat associations are 100% domestic animals, equivalent in species and behavioural profile to any other pedigree cat breed.

Research into the genomes of ~947 Bengal cats showed that the average proportion of leopard cat DNA in the Bengal breed is only about 3.5% [9]

In practical terms, this means that the functional genome, behavioural profile, and disease susceptibility of Bengal cats are equivalent to those of domestic shorthair cats. The minimal percentage of ALC DNA retained has no measurable impact on behaviour, predatory drive, or ecological fitness.

Environmental Risks

The concern that Bengal cats could negatively impact native wildlife or act as disease vectors if allowed to roam, while valid, scientific and genomic evidence does not support this concern when considering modern Bengal lines.

Bengal cats pose no greater risk to wildlife than any other domestic cat.

Contrary to the misguided beliefs of the Invasive Species Council, the Bengals' temperament, genetic makeup, and behaviour are domestic. With responsible ownership and containment, the impact on wildlife is zero – which applies to all cat breeds.

The impact of any cat on wildlife depends on how it is managed by its owner, not its breed. Responsible ownership, not breed type, determines wildlife outcomes.

Cats that are kept indoors, contained in secure outdoors enclosures or are supervised if outside do not have the opportunities to harm wildlife regardless of whether they are purebred breed or of unknown parentage.

Many breeds show similar or even stronger prey-chasing instincts. Predatory behaviour in cats depends more on individual temperament and environment than on breed.

Bengals today (F4 and later) are many generations removed from any wild cat ancestry. Their behaviour, physiology, and environmental impact is no different from any other breed classed as being domesticated (whether this is mixed parentage or purebred/pedigree). Remembering Australia has only imported F5 and later generations.

All cat registration bodies within Australia recommend and support cats being safely contained, and responsible, ethical breeders advocate for keeping cats contained (for their safety as well as the environment).

The wild survival traits of the Asian Leopard cat no longer exist within the Bengal, with the genetics for coat pattern and texture remain. This has occurred by careful breeding since the 1960's. Breeders in 2025 are working with cats that are Bengal to Bengal breeding for at least 4 generations and up (some at 10 generations)

The major threat to wildlife and the environment are the unfortunate cats that do not have a loving home and a supply of food from their owners. It is the feral, stray and unowned cats that are the product of irresponsible pet owners that live and breed without human care or

[9] National Library of Medicine - research

intervention, who are not contained and hunt for survival.

The cats that fall into these categories are not to blame, as some of them would have had an owner at some point but were allowed to roam and were not desexed.

Genetic Diversity:

There is an increased risk of inbreeding if breeders within Australia are unable to source new and unrelated bloodlines from other countries.

In breeding, "COI" stands for Coefficient of Inbreeding. It's a key concept used by breeders to understand how closely related the parents of an animal are, and to predict the potential risks of genetic disorders for their offspring.

For example:

- COI of 0% → parents are unrelated, offspring unlikely to be homozygous (recessive gene mutations) for shared genes.
- COI of 25% → offspring have a high chance of inheriting identical genes from both parents (common in sibling matings).

Benefits of Low COI

- Preserves genetic diversity.
- Reduces the likelihood of hereditary diseases.
- Maintains overall vigour and fertility.

Risks of High COI

- Increases the risk of genetic disorders (e.g., hypertrophic cardiomyopathy, PRA in cats).
- Can reduce immune function, fertility, and longevity.
- Repeated line breeding without attention to COI accelerates these risks

With a narrower gene pool, breeders are forced into higher COI which means the increased health issues in general and increased risks of inheritable diseases. These include:

- Less variation in immune systems leading to a weaker disease resistance
- Increase of homozygosity meaning recessive gene mutations are more likely to pair up
- Rare mutations that may have been present in the early breeding cats becomes increased through future generations

Limited outcross breeding may increase known health issues in this breed, and responsible breeders now use a range of tests and practices to minimise the likelihood of their cats passing on these diseases to their offspring.

The known genetic conditions that responsible breeders worldwide test for are noted below. A limited gene pool will mean these conditions will be harder to avoid in the future.

Condition	Type	How Genetic Diversity Plays a Role
Hypertrophic Cardiomyopathy (HCM)	Cardiac (heart muscle thickening)	Hereditary in many lines; limited outcrossing increases prevalence. Some lines have known mutations (MYBPC3 gene variants).
Progressive Retinal Atrophy (PRA-b)	Eye disease leading to blindness	Mutation traced to a small number of early Bengal lines; low genetic mixing spreads it widely in the breed.
Pyruvate Kinase Deficiency (PK-def)	Blood disorder (causes anemia)	Recessive gene; inbred or small populations have higher carrier rates.
Hip Dysplasia	Musculoskeletal	Genetic predisposition may worsen when diversity is low.
Flat-Chested Kitten Syndrome (FCKS)	Developmental	Complex inheritance, possibly linked to inbreeding or reduced robustness.
Chronic Diarrhea or IBD-like Conditions	Gastrointestinal	Partly genetic susceptibility; hybrid ancestry may influence gut flora, but lack of diversity can exacerbate intolerance issues.

It should be noted these conditions and other identified inheritable diseases are not exclusive to Bengals.

Solutions

There are sufficient mechanisms available to monitor the importation of Bengals into Australia, and most likely these are in place (given that those with permits can import until February 2026).

Importers were required to provide specific, certified documentation proving that their cat met the criteria of being an F5 generation cat including pedigree papers, health, and microchip records, and rabies/RNATT results (where applicable).

Animal Care Australia notes the application to have the ban amended states for desexed cats that are F5 (or G5) and above to be imported. Animal Care Australia sees no reason why the approval should be exclusive to desexed cats, and we note the application suggests the opportunity for importation for breeding purposes.

Animal Care Australia supports the importation of Bengal Cats with the following requirements:

- Strict import permit
- Genetic ancestry DNA test showing the wildcat DNA is less than 12.5%
- Certified pedigree papers showing SBT and minimum F4 status
- Declaration from the cat association that the pedigree has been verified
- Proof that the cat is registered with a recognised cat association
- Proof that the importer holds a current breeder membership with a recognised Australian cat association – for the purpose of importing an entire cat (not desexed). Persons who are not members of a cat association should be permitted to import desexed Bengals.
- Exporter declaration regarding the cat's generation status
- Centralised system (such as DAFF) to track all applications and approvals.

- Mandatory quarantine in an approved facility for the minimum timeframe for animals coming from the country of origin
- Certified health records including vaccination, rabies, RNATT and microchip, health status, highlighting any heritable factors the breeder should be aware of. These measures will ensure that imported Bengals contribute to a stronger, healthier gene pool, consistent with Australia's commitment to animal welfare and responsible breeding practices.
- Audits of import paperwork
- Penalties for false declarations
- Training for customs or quarantine officers on recognising early generation hybrid vs domestic cats
- Work with overseas breeders and registries to enforce import and export requirements
- Follow up with post importation checks

There is no evidence that supports that the conditions that had been in place from 2013 to 2025 with an exemption process for the importation of Bengal cats is flawed or does not work.

If a cat tests as 90% domestic and is 5 generations removed from a wild ancestor, it is no more likely that the cat is going to suddenly revert to wild survival mode than any other cat breed currently residing/existing in Australia.

What makes DCCEEW believe they know better than the rest of the world in recognising when these cats are domesticated?

When does DCCEEW consider it feasible to stop classing Bengals as hybrid cats? It is widely accepted internationally by cat registries and regulatory bodies that by the fourth generation (F4) a cat is defined as being domestic.

Veterinary Statement:

Based on the published genomic data (See Annexure 1) showing that modern Bengal cats contain less than 4% Asian Leopard Cat DNA with this ancestry being broadly and functionally neutral across the genome, there is no credible scientific basis to suggest that Bengals pose an increased threat to Australian wildlife or disease ecology when compared with domestic shorthair cats.

Their behavioural and biological characteristics remain consistent with Felis catus, and therefore, under controlled containment and breeder accountability, the associated biosecurity and environmental risks are minimal.

Closing statement:

It is misplaced to say Bengals would be responsible for any greater killing of natural wildlife in Australia than any other cat.

Even though Bengals have striking looks they are popular as pets because of their interactive personalities and hypo-allergenic coat. They enjoy playing games such as fetch and can be

easily walked on a lead like you can a dog – meaning they are suitable for containment as they can be exercised under supervision, especially by people without back yards.

The claim they are 'trophy' cats is simply not true. Breeders of Bengals report they sell a good majority of cats to families, particularly where one of the family has a cat allergy.

The 'trophy tag' is based on the fact Bengal kittens typically sell for $2,000 to $2,500 without breeding rights, with show or breeding kittens costing upwards of $5,000. However, it is precisely because of their cost the owners of Bengals are more likely not to consider letting them outside in fear they would be stolen or lost.

Adding this to the potential increased hereditable defects, the more existing Bengals are inter-bred with the same familial lines, it is extremely vital that new genetic values are permitted to be imported, otherwise the Australian government will either be responsible for the exasperation of poor animal welfare outcomes in the breed or the outright extinction of the breed in Australia.

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

We welcome the opportunity to meet with the department and the Minister in order to ensure a sensible outcome is reached.

This submission can be publicly listed.

On behalf of the Animal Care Australia Committee,

Michael Donnelly
President

Annexure 1: Supporting Scientific Evidence for Bengal Cat Genomic Composition and Hybridisation Risk

These peer-reviewed studies and genomic resources collectively support the finding that modern Bengal cats (F5 and later) possess a minimal proportion of Asian Leopard Cat (ALC) DNA (~3–4%), and that this admixture is diffusely distributed and functionally equivalent to domestic Felis catus. Together, they demonstrate that Bengals are genetically, behaviourally, and ecologically indistinguishable from domestic cats, and therefore pose no increased risk to native wildlife or biosecurity when responsibly managed.

Core Genomic Evidence

Kaelin, C. B., et al. (2024). Ancestry dynamics and trait selection in a designer cat breed. Current Biology, 34(6), 101020.
→ Confirms modern Bengals average 3.48% ALC ancestry, diffusely distributed across the genome; coat traits ('glitter', patterning) arise from domestic genes, not wild ancestry.

Bredemeyer, K. R., et al. (2021). Ultra continuous single haplotype genome assemblies for the domestic cat and Asian leopard cat. Journal of Heredity, 112(2), 165–174.
→ Provides high-quality reference genomes used to map hybridisation; shows strong genome alignment and minimal structural divergence between species, supporting Kaelin et al.'s low introgression findings.

Comparative Wildcat & Domestic Cat Studies

Pontius, J. U., et al. (2015). Comparative analysis of the domestic cat genome. Proceedings of the National Academy of Sciences (PNAS), 112(6), 1687–1692.
→ Establishes the domestic cat reference genome; used in multiple hybridisation studies including Kaelin et al. (2024) and Bredemeyer et al. (2021).

Trigo, T. C., et al. (2023). Limited historical admixture between European wildcats and domestic cats. Current Biology, 33(7), 1092–1103.
→ Demonstrates that even in natural overlap zones, gene flow between wildcats and domestic cats remains below 10%, showing limited ecological or behavioural blending despite cohabitation.

Howard-McCombe, J., et al. (2023). Genetic swamping of the critically endangered Scottish wildcat by domestic cat genes. Current Biology, 33(15), 1501–1512.
→ Illustrates large-scale hybridisation outcomes in unmanaged wild populations; provides context showing that significant behavioural change requires far greater introgression than observed in Bengals.

Methodological Foundations

Nussberger, B., et al. (2015). Toward a genome-wide approach for detecting hybrids: informative SNPs to detect introgression between domestic cats and European wildcats. Heredity, 115, 195–203.
→ Describes validated genomic methods used to detect hybridisation in Felis species, confirming the reliability of Bengal admixture quantification.

Yao, H., et al. (2023). Genetic differentiation between domestic cats and wildcats reveals genomic regions linked to domestication and behaviour. Journal of Animal Breeding and Genetics, 140(5), 521–533.
→ Identifies distinct genomic regions in domestic cats related to docility, sociability, and reduced predatory response; reinforces that Bengals, with domestically derived behavioural loci, do not retain wild-type aggressiveness or hunting drive.

Supplementary Evidence

Messybeast Feline Genetics Archive. (2023). Gene interactions in small cat hybrids. Retrieved from https://messybeast.com/small-hybrids/gene-interactions.htm
→ Summarises empirical breeder data showing that wild-type alleles are selectively bred out in successive Bengal generations; supports the observed behavioural normalisation by F5.

Veterinary Context Summary

Collectively, these studies demonstrate:
- The proportion of Asian Leopard Cat DNA in F5+ Bengals is below 4%, with no functional wild-gene enrichment.
- The behavioural, neurological, and ecological expression of Bengal cats is indistinguishable from domestic Felis catus.
- The methodologies used to determine admixture are robust and peer-validated.
- The genomic, behavioural, and disease risks cited in the original DCCEEW ban (2024) are therefore scientifically outdated and unsupported by current genomic data.