

24<sup>th</sup> October 2025

Prohibited and Restricted matter list consultation – Biosecurity Queensland  
Department of Primary Industries  
Email: bqconsultation@dpi.qld.gov.au

### **Biosecurity in Queensland: a review of the prohibited and restricted matter lists**

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.

Animal Care Australia has provided consultation to the Australian Government’s Threat Abatement Plan for predation by feral cats, the Victorian Cat Management Strategy and the Parliamentary Inquiry into the management of cats in NSW.

**IMPORTANT NOTE:** Question numbers outlined in the Discussion Paper DO NOT MATCH the question numbers within the online survey. This is highly unprofessional as stakeholders answers via written submissions provided to the Discussion Paper will not align with those from the general public completing the online survey.

#### **Responses to relevant survey questions:**

**Question 7. Are there any proposed pests, pathogens or diseases that don’t meet the criteria of being present or absent in Queensland?** and,

**Question 8. If answered “YES” to question 7. Provide details:**

Yes. The current listing includes ALL cats (*Felis catus*) except owned cats (domestic) within Category

3, 4 and 6 Restricted Matter is impractical and contradicts the Federal Threat Abatement Plan (TAP) which states there is a need to separate cats into different categories and act on those separately.

#### **Recommendation 2a**

The Committee recommends that the Australian Government undertake a body of work to improve understanding of the impact of feral, stray and domestic cats in Australia by:

- a. Collaborating with state and territory governments and other relevant stakeholders to develop and adopt a consistent definition of feral, stray and domestic cats, to be applied across national, state, territory and local government legislative and regulatory frameworks relating to cats.

The TAP identifies this need in order to provide effective management of free-roaming (semi-owned and unowned/community) cats in urban areas.

*(Picture: Recommendation within the Threat Abatement Plan)*

**Response**

AGREED

The Government recognises that multiple definitions of cats (*Felis catus*) from domesticated to wild continue to exist, to serve the requirements of people to classify cats for different management purposes and public perceptions on the meaning of the definitions. The Government will continue to work with relevant stakeholders to refine and align definitions where the management intent is the same, through collaborative platforms such as the Feral Cat Taskforce.

(Page 5 of Federal Government response to Recommendation 2a)

Under this continued Biosecurity Act 2014 these cats cannot be separated into domestic, stray and feral categories. Therefore, they cannot within the state of Queensland be fed, adopted or moved for desexing and must be euthanised. Under the TAP only feral cats must be euthanised while semi-owned or unowned (non-feral) cats must be assessed, desexed and rehomed wherever possible.

Cats in urban, semi-urban and rural areas cannot be reliably distinguished from a lost or wandering owned cat without a detectable microchip or collar. Microchips regularly fail!

By classifying all unidentified cats as restricted matter, the Biosecurity Act prevents proper management approaches that have already been proven to reduce cat numbers. These practices and improve community amenity by reducing nuisance behaviours and contribute to the ongoing reduction in feral cats.

**Solution:**

To ensure the Biosecurity Act 2014 and all persons responsible for dealing with cat management, can operate with clarity and effective management outcomes, and where necessary enforceability, the definition of restricted matter for *Felis catus* should be amended to apply only to ‘feral cats’. This would still align with the approach taken for other declared species of restricted matter.

The ‘Definitions’ section should be amended to clarify the difference between domestic and feral cats. Animal Care Australia strongly recommends the definitions provided on pages 7 and 8 of the TAP 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 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.

**Question 9. Are there any proposed pests, pathogens or diseases that don’t meet the criteria of having an adverse impact on a biosecurity consideration (human health, social amenity, the economy or the environment)? and,**

**Question 10. If answered “YES’ to question 9. provide details:**

Street cats (unowned or semi-owned) are part of a community. Multiculturalism in particular, has resulted in people regularly providing food, shelter, and care, even if they don't officially "belong" to any individual.

Feral cats generally live away from towns and people, surviving entirely on predation and scavenging and they pose a significant risk to threatened and endangered wildlife as well as to any domestic cats within that area.

The continued classification of stray cats as restricted matter prevents effective management targeted at reducing numbers of both categories. It restricts management solely to lethal measures which is costly, time consuming and damages the mental health of veterinarians and staff.

Animal Care Australia is aware that some cat caregivers and members of rescue groups are being prosecuted for feeding and rehoming cats and kittens, while veterinarians taking in stray cats and kittens and are being threatened with breaches of the Biosecurity Act. This approach no longer meets community expectations.

Non-microchipped 'free roaming' cats on farms are currently considered as restricted matter and therefore legally should be fed, moved (for desexing or adoption) creating a substantial barrier to reducing the risk of zoonotic diseases such as toxoplasmosis. Cats have lived on Australian farms for centuries and are valued for controlling rodents. However, these animals are often not claimed to be owned by property owners for fear of prosecution. Equally if numbers start to rise, farmers are forced to euthanise the animals rather than have the (legal) ability to rehome them. Allowing the responsible management through desexing, feeding, basic healthcare, and formally recognising these cats as working animals would reduce these harms and the psychological stress for farmers associated with lethal management.

**Question 11. Are there any other pests, pathogens or diseases that are a significant priority for you or your region, and require regulation over and above the general biosecurity obligation? If yes, please provide details on how the pest, pathogen or disease meets the prohibited or restricted matter criteria. And,**

**Question 12. If answered "YES" to question 11. provide details.**

All cats are vectors of *Toxoplasma gondii* (*T. gondii*) and are definitive hosts of sarcocystis. The risk cats pose to food safety can be mitigated by routine desexing and provision of food. Desexing of domestic, stray including community and working cats reduces cat numbers over time. This decreases the environmental contamination with toxoplasmosis oocysts, as younger cats are the primary shedders of these oocysts.

The provision of food by communities and/or farmers reduces the cats' need to consume rodents, which helps break the cycle of toxoplasmosis and sarcocystis infection in the cats, without interfering with the presence of cats being a deterrent for rodents.

**Question 13. Are there any proposed listings that will have unreasonable impacts on you or your organisation? If yes, please provide details below. And,**

**Question 14. If answered "YES" to question 13. provide details.**

As an animal welfare organisation our primary aim is to educate the Community and in particular cat owners on responsible pet ownership and the importance of ensuring owners desex, microchip and contain their domestic cats to their properties. We equally encourage the community to recognise the welfare needs of community cats and where it is possible to seek veterinary assistance and possible rehoming of these cats. The current Act makes that illegal in Queensland.

The Queensland Government is not only actively contradicting the Federal Government Threat Abatement Plan, but also is contributing to the mismanagement of stray cats and therefore increasing the numbers of feral cats. All of which this Act is 'supposed' to be controlling and reducing 'invasive cats'.

It is no longer acceptable within the community for cats that are not categorically identified as feral cats to simply be euthanised. It is even expected that trapped feral cats will be assessed for potential rehoming and if not suitable then be humanely euthanised.

The exclusion of declaring feral cats only as invasive restricted matter means the Biodiversity Act is completely out of line with what the majority of Australia's pet keeping community believe is fair and humane.

**Question 15. Once the prohibited and restricted matter list changes are implemented, are there any further resources we can provide (training, fact sheets etc) to support you? If yes, please provide details below.** And,

**Question 14. If answered "YES" to question 13. provide details.**

Reducing free-roaming cats across the State requires funding and collaboration between governments, welfare groups, industry and communities.

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,

A handwritten signature in black ink that reads "M Donnelly". The signature is written in a cursive style with a large, looping 'M' and a long, sweeping tail.

Michael Donnelly  
President  
0400 323 843  
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